

Compliance plan for Powerco 2017

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 01-Jul-16 To: 30-Jun-17	Initial energisation date not taken from the energisation paperwork but use the meter certification instead. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as weak as Powerco rely on the MEP and have no visibility of the actual energisation date of ICPs I have rated the audit risk rating as low as the initial energisation date has no direct impact on settlement		
Actions taken to resolve the issue		Completion date	Remedial action status
Powerco believes the meter certification date is generally the most reliable source for this information, as the same contractor is often installing the meters is electrically connecting the ICP.			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We will investigate the development of new monitoring tools to sanity check the IED, and where discrepancies arise, we can investigate the accuracy of this date.		March 2018	
1. Creating separate "ICP jobs" linked to the "Network Construction job" in CIWE for a given connection for larger works. This means the ICP WCN is not dependant on the full completion of the Network Construction job.		Implemented Mid 2017	
2. Review and follow up with contractors from the monthly WCN reports, where there are timeframes in excess of 3 working days.		March 2018	
3. Contractor education about Initial Energisation Date vs Works Completed Dates		March 2018	
Powerco to reassess what is the appropriate source of the Initial Energisation		March 2018	

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: 11.5(3) From: 30-Sep-16 To: 01-Aug-17	1 ICP not created within three days Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Powerco's system has robust controls in place. The one late ICP creation was an exception hence controls are rated as strong. The audit risk rating is low as only one ICP was affected.	
Actions taken to resolve the issue		Completion date
Daily report has been created to reduce the risk of the ICP request being delayed, where incorrect/missing flags in Customer Initiated Works system are the cause.		25/08/2017
Preventative actions taken to ensure no further issues will occur		Completion date
As above, a daily report has been created that reduces the likelihood of human error creating delays in ICP creation.		25/08/2017
		Identified

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: 7(2) of Schedule 11.1</p> <p>From: 01-Jan-17</p> <p>To: 30-Jun-17</p>	<p>Registry not updated prior to commencement of trading in some cases.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Delays from external parties are causing delays therefore I have rated the controls as moderate.</p> <p>The overall level of compliance is high hence the number of ICPs affected will have a minor impact on settlement hence the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Powerco has notified participants & stakeholders of the importance of accepting responsibility for the ICP (Retailer Acceptance process) and not electrically connect an ICP prior to ICP being "Ready".		
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Powerco has a monthly report that monitors the performance of Powerco Approved Contractors, this includes monitoring timeframes for job completion.</p> <ul style="list-style-type: none"> - Review and follow up with contractors from the monthly reports, where there are timeframes in excess of 3 working days. - Educate contractors about Initial Works Completed Date- - Work closely with all stakeholders to ensure there is a clear understanding of all involved to provide information in a timely manner. 		<p>March 2018</p> <p>March 2018</p>
		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-Jan-17</p> <p>To: 31-Jul-17</p>	<p>Late population of initial energisation date for some 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>Powerco rely on the MEP to populate the meter certification date means controls are weak for this process.</p> <p>This has no direct impact on submission hence the audit risk rating is low</p>	
Actions taken to resolve the issue		Completion date
Daily reporting to ensure IED has been populated in the registry. Additional manual checks of registry are made.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>1. Analysis of actual IED in the field, using contractors who do both metering installation and network connection, to determine the accuracy of the various dates for each part of the connection process</p> <p>2. Creating separate "ICP jobs" linked to the "Network Construction job) in CIWE for a given connection for larger works. This means the ICP WCN is not dependant on the full completion of the Network Construction job. This change has already started to be implemented.</p> <p>3. Review and follow up with contractors from the monthly WCN reports, where there are timeframes in excess of 3 working days.</p>		March 2018
		Implemented Mid 2017
		March 2018
		Identified

Connection of ICPs		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 11.17</p> <p>From: 01-Jan-17</p> <p>To: 30-Jun-17</p>	<p>Some ICPs electrically connected prior to having a “trader” nominated on the registry</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Delays from external parties are causing delays therefore I have rated the controls as moderate.</p> <p>The overall level of compliance is high hence the number of ICPs affected will have a minor impact on settlement hence the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Affected ICP resolved prior to audit.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Investigate the creation of a “Retailer Acceptance” report to help inform stakeholders of their requirements to accept ICPs before electrically connecting them.		December 2017
		Investigating

Electrical connection of ICPs		
Non-compliance	Description	
<p>Audit Ref: 3.7 With: 10.28(7)</p> <p>From: 01-Jan-17 To: 30-Jun-17</p>	<p>Some ICPs electrically connected prior to retailer accepting responsibility and therefore before the request to electrically connect has not been given.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>Delays from external parties are causing Powerco to update the registry late, therefore I have rated the controls as moderate.</p> <p>The overall level of compliance is high hence the number of ICPs affected will have a minor impact on settlement hence the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Communicate with other stakeholders of the importance of the “Retailer Acceptance” step in the new connections process.</p> <p>Investigate the creation of a “Retailer Acceptance” report to help inform stakeholders of their requirements to accept ICPs before electrically connecting them.</p>		December 2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Investigate the creation of a “Retailer Acceptance” report to help inform stakeholders of their requirements to accept ICPs before electrically connecting them.</p>		December 2017
		Investigating

Electrical connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: 10.31</p> <p>From: 01-Jan-17</p> <p>To: 30-Jun-17</p>	<p>Some ICPs electrically connected prior to retailer accepting responsibility and therefore before the request to electrically connect has not been given.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>Delays from external parties are causing delays therefore I have rated the controls as moderate.</p> <p>The overall level of compliance is high hence the number of ICPs affected will have a minor impact on settlement hence the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Communicate with other stakeholders of the importance of the "Retailer Acceptance" step in the new connections process.</p> <p>Investigate the creation of a "Retailer Acceptance" report to help inform stakeholders of their requirements to accept ICPs before electrically connecting them.</p>		December 2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Work with stakeholders to highlight areas that can be improved and the importance of having approval to electrically connect before livening.</p> <p>Investigate the creation of a "Retailer Acceptance" report to help inform stakeholders of their requirements to accept ICPs before electrically connecting them.</p>		December 2017

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: 8 Schedule 11.1</p> <p>From: 01-Jan-17</p> <p>To: 30-Jun-17</p>	<p>Registry event updates backdated greater than three days</p> <p>954 ICPs change of NSP not updated within the required timeframe</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have rated the controls as moderate as the controls in place will mitigate the risk most of the time.</p> <p>There is a potential minor impact on settlement, hence the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Network Connections and Data team to continue to work improving the timeliness of updates to registry. Powerco is obliged to provide complete and accurate information to registry and in some instances by doing so cannot comply with the timeframes prescribed in the code.</p> <p>The process for NSP Balance Changes has updated. Within this new process information is now being distributed in a more timely manner.</p> <p>At the request of retailers, and for the benefit of customers, Powerco will back date a price category changes. Powerco and retailers are bound by UoSA to backdate and/or make corrections to price category which works well with revision billing.</p>		In place
Preventative actions taken to ensure no further issues will occur		Completion date
		Investigating

<p>NSP switching notification process between Network Operations and the Network Connections and Data team has been reviewed, and a new process has been implemented to reduce the likelihood of this incident being repeated.</p> <p>Continual communication and education with all stakeholders involved that have an effect on the timing of registry updates.</p> <p>In regards to delays being the result of late paperwork for Customer Works, that have an impact on registry transactions:</p> <ol style="list-style-type: none"> 1. Analysis of actual IED in the field, using contractors who do both metering installation and network connection, to determine the accuracy of the various dates for each part of the connection process 2. Create separate "ICP jobs" linked to the "Network Construction job" in CIWE for a given connection for larger works. This means the ICP WCN is not dependant on the full completion of the Network Construction job. This change has already started to be implemented. 3. Review and follow up with contractors from the monthly WCN reports, where there are timeframes in excess of 3 working days. 4. A new process for the processing of distributed generation applications is being implemented; however this will still not address the industry-wide issue of installers acting without distributor approval at private residences. 	<p>March 2018</p> <p>Implemented mid 2017</p> <p>March 2018</p> <p>March 2018</p>	
--	---	--

Notice of NSP for each ICP		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: 7(1),(4) and (5) Schedule 11.1</p> <p>From: 01-Jul-16</p> <p>To: 30-Jun-17</p>	<p>Some historic incorrect NSPs recorded against a potential 535 ICPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have rated the controls as strong as this is an historic issue and current controls in the creation of ICPs prevent this occurring.</p> <p>I have rated the audit risk rating as medium due to the number of potentially mismatched ICPs identified across multiple NSPs and balancing areas which if found to be incorrect will have an impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
<p>Powerco has analysed all ICPs provided by Veritek. 218 of the ICPs suspected were on the correct NSP. 305 are incorrect on registry, of which 138 have now been fixed. 12 need to be investigated because of their Geolocation.</p> <p>All ICPs found with during the audit were the result of old legacy issues with old data, that had not been found since acquisition of older networks and various data migrations.</p> <p>For any new ICPs it is not possible for NSP to be incorrect on an ICP due to our strong system based controls.</p>		In place
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing data cleansing project to fixing legacy issues and NSP validation to ensure NSPs recorded in registry are correct.		March 2018
		Identified

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: 2 Schedule 11.1</p> <p>From: 01-Jul-16</p> <p>To: 30-Jun-17</p>	<p>10,710 ICPs with addresses that are either duplicated or not readily locatable</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as strong as only four ICPs created during the audit period (0.08%) had duplicated addresses.</p> <p>The audit risk rating is medium as the volume of ICPs that are not readily locatable is still large and this can have a direct impact on the retailer's ability to read, disconnect and reconnect these sites.</p>	
Actions taken to resolve the issue		Completion date
<p>Powerco is currently undertaking a large address cleansing project to resolve duplicate and incomplete addresses. Over the last year having resolved over 5000 address non-compliance issues, the team is committed to resolving the history address non-compliances.</p>		October 2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>System validation is already in place. In the rare event that a non-compliant address is event is sent to registry, it will be captured up by Powerco exception reporting.</p>		In place
		Identified

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Jul-16</p> <p>To: 30-Jun-17</p>	<p>Distributed generation connected without being recorded in the registry</p> <p>Initial energisation dates derived from meter certification and not energisation records</p> <p>Some incorrect unmetered load descriptions recorded (maximum of 23)</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	<p>The controls are rated as the weak as the use of the meter certification date is not necessarily the energisation date and the management of Distributed generation is not capturing all connections in a timely way.</p> <p>Distributed generation has a direct impact on settlement therefore the audit risk rating is medium</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Continue to develop and improve existing processes in order ensure information accuracy and integrity.</p> <p>This includes:</p> <ul style="list-style-type: none"> - DG process improvements (underway) March 2018 - Unmetered load ongoing data cleansing of historic issues (underway) May 2018 - Investigate the creation of a IED Validation report 		May 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We are about to implement a new DG process that will track and follow up on DG applications.</p> <p>We have also developed more robust reporting to help track any unapproved DG installation on the Powerco network.</p> <p>Contractor education about Initial Energisation Date vs Works Completed Dates</p> <p>Powerco to reassess what is the appropriate source of the Initial Energisation</p>		March 2018	