

Compliance Plan for Network Waitaki MEP – April 2020

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 16-May-19 To: 06-Mar-20	Two records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area as Network Waitaki has checks in place to identify and resolve discrepancies and the number of late updates was low. The impact on participants, customers or settlement could be minor where a certification update is late; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
In the middle of last year, a series of Data Discrepancy reports were written and these have proved very beneficial to keeping data accurate in the Registry and NWL's CRM system.		24/4/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
NWL feels that the introduction of the Daily and Weekly Data Discrepancy Reports has been hugely beneficial towards keeping records accurate in both data bases. It has shown itself already to be a strong tool and will continue to be built on to assist for future requirements.		24/4/2020	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 1(1) of Schedule 11.4 From: 08-Nov-18 To: 06-Mar-20	Four late acceptances. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as reporting is in place to identify issues. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The discrepancy report written middle of last year has helped identify MEP switches waiting in the registry as soon as they are loaded in.		24/4/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The discrepancy report was introduced it has stopped this breach from occurring.		24/4/2020
		Cleared

Provision of Registry Information			
Non-compliance	Description		
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 07-Mar-19</p> <p>To: 06-Mar-20</p>	<p>Small number of registry discrepancies.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong in this area because there were only a small number of issues which are all now resolved.</p> <p>There could be a minor impact on the retailer for one ICP where the register content code is UN but a control device is present. The audit risk rating is therefore low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A Discrepancy report was written middle of last year		24/4/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The running of a Discrepancy reports both daily and weekly, identifies Data errors which allow timely corrections within code guidelines		24/4/2020	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4 With: Clause 6 of Schedule 11.4</p> <p>From: 16-Aug-19 To: 06-Mar-20</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> - Two Category 1 ICPs not inspected, - One Cat 2 ICP certified with low burden. <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as strong as Network Waitaki has a regime in place and only two inspections were not conducted due to access issues.</p> <p>It is unlikely that the missed inspections will impact on other participants and on settlement. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Issue 1: NWL tried a number of times to gain access to this site. The site owner Vodafone, wanted NWL's Inspector to travel to Christchurch (500kms round trip) to undertake an induction, before he could go onsite to undertake the Inspection. NWL is going to approach Vodafone to see if they would consider replacing the NWL meter with an NGC Smart meter to help with access issues and, as the NGC Meter Installer has been through the induction process will hopefully mitigate this situation.</p> <p>Issue 2: NWL will again notify the Retailer and technically the Retailer should stop trading onsite until the Property owner gives NWL access to recertify ICP.</p> <p>Issue 3 - The Cat 2 ICP: NWL will undertake some research to ascertain going forward, what will be the best option for this site. We could convert the ICP to whole current metering but would first like to ring Vircom in Rangiora to discuss options with them.</p>		31/7/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>While it is out of NWL's control if access cannot be gained and there is no assistance from the Retailer to achieve the desired result, NWL will always work hard to try and rectify the issue.</p>		31/4/2020
		Identified

Certification and Maintenance			
Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7</p> <p>From: 05-Jan-20</p> <p>To: 06-Mar-20</p>	<p>Certification expired for 101 ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong because Network Waitaki has a good process in place to identify and recertify installations.</p> <p>The impact on settlement is recorded as low. The likelihood of failure or inaccuracy for metering installations with expired certification is low based on the age and type of meters and previous calibration results for these meters.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The Metering Office contacted the Test-house prior to the lock down and was informed it would be at least two weeks after they returned to work before NWL's meters would be tested. Once that occurs, NWL will update the Registry with the new date effectively making all the Expired Certs current again.</p>		30/6/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>NWL intends to bring forward the start of the 2021 Stat sample to effectively bring forward the testing of the Meters at the Test-house. Our aim is for Meters to be at the Test-house no later than early to mid-November.</p>		24/4/2020	

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 16-Aug-19 To: 06-Mar-20	Two Category 1 ICPs not inspected. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong as Network Waitaki has a regime in place and only two inspections were not conducted due to access issues. It is unlikely that the missed inspections will impact on other participants and on settlement. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Will cancel Inspections		30/4/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Not sure how NWL can overcome access issues but certainly more assistance from the retailers would help and NWL will continue to be proactive to gain access to sites to complete the inspections.		24/4/2020
		Remedial action status
		Identified