

Compliance plan for Electric Kiwi - 2022

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 & 15.2 From: 01-Feb-21 To: 31-Mar-22	Incorrect information in the registry for small number of ICPs Volumes not submitted for 3 bridged meters Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Audit risk rating is recorded as low because the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Affected ICPs were reviewed to determine if volumes could be submitted within allowable timeframes. If allowed volumes were submitted to the reconciliation manager.		30/06/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will review process documentation and retrain staff to ensure the bridged meter procedure is being followed. We will also implement additional reporting to monitor the effectiveness of the process.		31 Aug 2022	

Non-compliance	Description		
Audit Ref: 2.11 With: 10.33A From: 01-Feb-21 To: 31-Mar-22	2 reconnected metering installations with expired certification Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak. There is no process for checking an installation reconnection before asking a MEP to re-establish supply and asking for re-certification if needed. Checking of certification of metering installation is not part of sign up process. When such situation occurs, MEPs are not contacted. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
MEP's Will be contacted to request that they recertify the meter.		30/06/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will implement additional reporting to track uncertified meters and a supporting process to follow up with MEPs.		31/08/2022	

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Feb-21 To: 31-Mar-22	Some late status and trader updates Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
No Action was taken to resolve this issue as affected ICPs were already corrected.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Audit Compliance Reporting has been established that will be run quarterly to identify issues sooner. Refresher training will also be completed with our team to highlight the importance of this process.		31/08/2022	

Non-compliance	Description		
Audit Ref: 3.5 With: 9 of Schedule 11.1 From: 01-Feb-21 To: 31-Mar-22	<ul style="list-style-type: none"> • ANZSIC code populated late for 7 ICPs . • Profile and type of reconciliation for 12 ICPs incorrect in the registry Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
No actions taken as the affected ICPs have already been corrected.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Audit Compliance Reporting has been established that will be run quarterly to identify issues sooner. Refresher training will also be completed with our team to highlight the importance of this process.		31/08/2022	

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 01-Feb-21 To: 31-Mar-22	5 ICPs have incorrect ANZSIC code (sampling of 22 ICPs). ANZSIC code "T30*" was assigned to premises where construction was possibly complete Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. The current process needs to be more stringent to validate the ANZSIC code during the sign up process. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue	Completion date	Remedial action status	
Preventative actions taken to ensure no further issues will occur	Completion date	Identified	
Electric Kiwi already includes a step in the sign-up process to confirm with customers the ANZSIC code where indicated that construction is still underway. The process requires an additional follow up step where customers do not respond within 2 weeks of contact. Our team our reviewing the most effective contact procedure to resolve these exceptions.	31/07/2022		

Non-compliance	Description		
Audit Ref: 4.2 With: 3 and 4 of Schedule 11.3 From: 01-Feb-21 To: 31-Mar-22	One AN file late, incorrect use of the switch response code "AA" Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. Only one AN file was late. Incorrect use of the "AA" code is a result of auditor's misinterpretation during the last audit. There is no impact because the presence of AMI metering is a registry field and the content of the AN file is not normally used as a source of information to confirm the presence of AMI. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
No actions have been taken as the affected ICP has already been corrected.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will implement refresher training to highlight the importance of using the correct response codes as well as the importance the timely response submission.		31/07/2022	

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 01-Feb-21 To: 31-Mar-22	<ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.36. • Incorrect average daily consumption for one ICP • Incorrect read type flag and incorrect switch event meter reading for 3 ICPs Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The calculation of average kWh per day is gives a reasonable indication of the average daily consumption. While the ELKI calculations are not technically consumption for the last read to read period, it provides a reasonable indication of the average daily consumption.</p> <p>Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action was taken as CS files were already sent.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will investigate the incorrect cases to determine if a system improvement could be made to fix the issue.		31/08/2022	

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 01-Feb-21 To: 31-Mar-22	<ul style="list-style-type: none"> • 161 AN files had a proposed transfer date earlier than the gaining trader's proposed date • Incorrect use of the switch response code "AA" Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating:3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak. The number of incorrect AN files is low, but the concern is that the issue was identified two audits back, no issue noted in the last audit and now the issue was identified again during this audit. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken as files were already submitted and cannot be taken back.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi has already fixed the issue with AN files however will implement quarterly switch breach monitoring to improve controls.		31/08/2022	

Non-compliance	Description		
Audit Ref: 4.9 With: 10(2) of Schedule 11.3 From: 01-Feb-21 To: 31-Mar-22	Two late CS files Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. The system is fully automated, one late CS file was late by a human error, the second one was caused by sending the CS file after 7:30pm. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken as files were already submitted and cannot be taken back.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will implement refresher training with an aim to reduce the frequency of human error.		31/08/2022	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 11 of Schedule 11.3</p> <p>From: 01-Feb-21</p> <p>To: 31-Mar-22</p>	<ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.36. • Incorrect read type flag and incorrect switch event meter reading for 3 ICPs <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The calculation of average kWh per day is gives a reasonable indication of the average daily consumption. While the ELKI calculations are not technically consumption for the last read to read period, it provides a reasonable indication of the average daily consumption.</p> <p>Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken as CS files were already submitted.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will investigate the incorrect cases to determine if a system improvement could be made to fix the issue.		31/08/2022	

Non-compliance	Description		
Audit Ref: 4.11 With: 12 of Schedule 11.3 From: 01-Feb-21 To: 31-Mar-22	Four late RR which were sent after 4 calendar months Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. Good controls in place. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken as these are unable to be corrected.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will implement refresher training with an aim to reduce the frequency of human error.		31/08/2022	

Non-compliance	Description		
Audit Ref: 4.15 With: 17 of Schedule 11.3 From: 01-Feb-21 To: 31-Mar-22	32 late NW files (more than 2 months) Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. They are sufficient to mitigate risk in most cases. Only 32 NW files were late. The audit risk rating is low, a small number of files were affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action was taken as these were unable to be corrected.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi is unable to implement additional preventive actions.		N/A	

Non-compliance	Description		
Audit Ref: 6.1 With: 10.13 and 15.2 From: 01-Feb-20 To: 31-Mar-22	Energy is not metered and quantified according to the Code where meters are bridged Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Upon receiving advice from MEP that a site has been bridged, Electric Kiwi takes action to unbridge the meter and estimate usage for the period in question.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will implement refresher training to highlight the importance of following this process.		31/08/2022	

Non-compliance	Description		
Audit Ref: 12.7 With: 10.13 and 15.2 From: 01-Feb-21 To: 24-Feb-22	Volumes for 3 bridged meters were not estimated and submitted to the reconciliation manager Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak. The company have a good estimation process, a good monitoring of missing data but for some instances monitoring process allows some ICPs “to slip through” and volumes are not estimated and submitted. Audit Risk Rating is recorded as low as the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Affected ICPs were reviewed to determine if volumes could be submitted within allowable timeframes. If allowed volumes were submitted to the reconciliation manager.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electric Kiwi will review process documentation and retrain staff to ensure the bridged meter procedure is being followed. We will also implement additional reporting to monitor the effectiveness of the process.		31/08/2022	