

Compliance plan for Trustpower Reconciliation Participant – 2018

Provision of information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2 & 15.2</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Small number of registry discrepancies affecting three ICPs.</p> <p>Inactive status not being applied for the correct periods for disconnected ICPs with consumption.</p> <p>Potential impact: Medium</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>The controls are strong, as they mitigate risk to an acceptable level.</p> <p>The impact on settlement is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Trustpower continues to utilise exception reporting as part of our business as usual processes to identify and resolve Registry discrepancies. It's pleasing to see that our focus on data integrity is reflected in the results achieved this audit and the improvement in the results. We will continue to engage with 3rd parties i.e. Traders, Distributors and customers to maintain and, where possible, improve our performance in this area.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Additional discrepancy reporting built to account for inaccurate inactive statuses (as discussed in section 3.9)		Complete by: 01/10/2018
Trustpower will continue its focus on identifying and resolving Registry discrepancies to ensure the integrity of our data.		Ongoing

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 01-Jun-17</p> <p>To: 31-Jul-18</p>	<p>4 ICPs certified late.</p> <p>24 ICPs reconnected and not certified within 5 business days.</p> <p>1 ICP reconnected by bridging and not re-certified.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because reporting is in place to identify metering certification issues, so they can be resolved.</p> <p>The impact on settlement is recorded as minor because the 24 installations with expired interim certification may be less accurate than certified metering installations.</p>	
Actions taken to resolve the issue		Completion date
Trustpower continues to utilise exception reporting as part of our business as usual processes to identify and resolve liveness discrepancies. It's pleasing to see that our focus on data integrity is reflected in the results achieved this audit. We will continue to engage with 3rd parties i.e. Traders, Distributors and customers to maintain and where possible, improve our performance in this area.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We have built additional reporting to identify reconnections that have occurred on fully, or interim expired, meters so we can work with the MEP to have the meter recertified within 5 business days. Along with also identifying un-bridged meters that also require recertification.</p> <p>We are engaging with our HHR MEPs to reach agreement on having all HHR meters certified the day of liveness, even if there isn't appropriate load on site.</p>		<p>Completed on: 1/10/2018</p> <p>Completed by: 30/11/2018</p>
		Identified

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Registry information not provided within 5 business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
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 impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Trustpower continues to look for opportunities to refine our reporting and processes to improve our performance in updating registry information within 5 business days. It's pleasing to see this reflected in our results and we will continue to monitor our own performance and work with our MEP and contractors to ensure the timely and accurate return of metering paperwork. We are happy to have shown improvement in 3 out of 4 categories, with just changes to active-reconnections dropping from 88 to 84% - however, our time to process these changes dropped significantly from 5.4 down to 4 days on average.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Trustpower will continue its focus on identifying and resolving Registry discrepancies to ensure the integrity of our data. We will also continue to engage with 3rd parties i.e. Traders, Distributors and customers to maintain and where possible, improve our performance in this area.		Ongoing
		Investigating

Provision of registry information		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Some late status updates for new connections.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
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 impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Trustpower continues to look for opportunities to refine our reporting and processes to improve our performance in updating New Connection registry information within 5 business days. We actively look for trends with status breaches to help identify particular participants or contractors that may be dropping the ball. Nonetheless, we are satisfied to see both major categories above the 90% threshold, and can justify the small drop in performance around changes to INC due to our increased activity in the Mutli-Dwelling Unit (MDU) space whereby we often make the decision to delay registrations to help improve efficiency.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We will continue to seek out opportunities to improve the efficiency of our New Connection Process to ensure the timeliness and accuracy of our updates are as efficient and streamlined as possible. Under this banner, we are undertaking a review of the HHR New Connection process as a large percentage of our HHR New Connections result in late status changes, or discrepancies - part of this will involve working on changing the behavior of other participants.		Complete by 1/11/18
		Identified

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Some incorrect unmetered load figures in the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they have recently been improved and they identify all potential errors.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Prior to the audit we had incorporated new controls (reporting) following recommendation from the last audit. This new control will address issues as they arise, but given the nature of this non-compliance, we will not eliminate the issue, rather address them as they occur.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We will continue to work through the new reporting and correct the unmetered load details currently in existence. This will be an on-going process due to the lack of data around some sites.</p>		Ongoing
		Identified

Management of Active status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 of schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Four incorrect active dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low as the volume of ICPs with an incorrect active date was low when compared to the volume of new ICPs electrically connected.</p>	
Actions taken to resolve the issue		Completion date
As noted by the auditors, only 4 ICP's were identified as having incorrect active dates originally populated. Trustpower works closely with its contractors and 3 rd parties to ensure best practice around livening and communication is adhered to. Whilst ICP's slip through we are satisfied that those identified by the auditor had already appeared on our discrepancy reporting and were currently under investigation. For this reason, these 4 ICPs with incorrect dates were resolved via our business as usual processes after the audit.		Completed on: 1/10/18
Preventative actions taken to ensure no further issues will occur		Completion date
Trustpower remains committed to staying on top of this issue through ensuring every single connection date discrepancy is identified and investigated within a matter of business days. Ensuring each are resolved in a timely matter, and that any worrying trends or behaviour are called out and addressed.		Ongoing
		Identified

Management of Inactive status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Aug-17 To: 05-Sep-18</p>	<p>ICPs recorded at the incorrect status on the registry</p> <p>ICP 0007185876RN16B (see section 3.8) is at the incorrect status on the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls in place are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur as was evident in the findings in relation to disconnected ICPs with consumption.</p> <p>The impact is assessed to be low as this affects only a small number of ICPs.</p>	
Actions taken to resolve the issue		Completion date
We have built several new reports and added new steps to our processes to stop these issues from reoccurring		Completed on: 1 st October 2018
Preventative actions taken to ensure no further issues will occur		Completion date
We will continue to monitor the effectiveness of these new controls.		Ongoing
		Identified

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clause 3 Schedule 11.3</p> <p>From: 01-Apr-18 To: 30-Jun-18</p>	<p>16 AN files with AA instead of AD.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level. Only one minor issue related to AN response codes was found.</p> <p>Participants do not rely on this field, they rely on the registry fields; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
A job has been logged to analyse why this process is not selecting correctly in <i>all</i> instances.		Complete by: 1/12/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing monitoring. We will also pay attention to the outcomes from the upcoming EA Switch Process consultation.		Complete By: 2/4/19
		Investigating

Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Some incorrect switch event meter readings and some incorrect average daily consumption.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement with regard to CS file content.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Prior to the audit, we were that there were sometimes instances of incorrect daily consumption within our CS File Content. A job had already been logged to address this issue prior to the audit but had yet to be completed. Job was logged 21st August 2018.</p> <p>The interpretation around incorrect switch event meter readings has evolved since the last audit. This is related to AMI sites and the need to use midnight reads as at event date. Subsequent to this current audit, Trustpower received confirmation from the EA of the EA's current interpretation.</p> <p>We have multiple jobs logged as high priority to fix final tweaks regarding our CS files. This includes correct reads being populated as at event date, using AMI reads for AMI sites and correct daily average consumption in all instances.</p>		Complete By: 1/5/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Jobs to fix have been escalated as high priority.		Complete By: 1/5/2019
		Identified

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>11 late files and one actual read recorded as an estimate.</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Actual read recorded as an estimate –</p> <p>A job is logged with Gentrack to enable read types (actual/estimate) to be recorded when completing Read Change Requests via Gentrack. This auto populates at present to an estimate and cannot be over-ridden.</p> <p>Late read changed requests –</p> <p>A job has been logged to stop any read change requests from within Gentrack being sent outside the 4 month time frame. Negotiation via email between retailers will be used instead. This will eliminate any breaches</p>		<p>Complete By: 1/5/2019</p> <p>Complete By: 1/5/2019</p>
Preventative actions taken to ensure no further issues will occur		Completion date
Trustpower will remain focused on this area. Monthly reporting will continue to be monitored for breach numbers until the job has been delivered that will not allow late read change requests to be sent via the Registry.		Ongoing
		Identified

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>24 incorrect response codes.</p> <p>Two transfer dates prior to requested dates.</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>There is no impact due to incorrect response codes, other traders use the registry to obtain this information. The impact on participants is minor due to the proposed event date issues; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A job has been logged to analyse why this process is not selecting correctly in <i>all</i> instances.</p> <p>Transfer dates prior to request dates: A new report will be created and data analysed via monthly to monitor any transfer dates prior to requested dates.</p>		Completed By: 1/12/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Ongoing training and monitoring of exceptions</p> <p>In light of the current EA Switch Review consultation, Trustpower is mindful that the costs involved to fix some of these smaller immaterial issues far outweighs the impact.</p>		Ongoing	

Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Some incorrect switch reads.</p> <p>Some incorrect daily consumption.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Prior to the audit, we were that there were sometimes instances of incorrect daily consumption within our CS File Content. A job had already been logged to address this issue prior to the audit but had yet to be completed. Job was logged 21st August 2018.</p> <p>The interpretation around incorrect switch event meter readings has evolved since the last audit. This is related to AMI sites and the need to use midnight reads as at event date. Subsequent to this current audit, Trustpower received confirmation from the EA of the EA's current interpretation.</p> <p>We have multiple jobs logged as high priority to fix final tweaks regarding our CS files. This includes correct reads being populated as at event date, using AMI reads for AMI sites and correct daily average consumption in all instances.</p>		Complete By: 1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Jobs to fix have been escalated as high priority.		Complete By: 1/5/2019	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12 of Schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>19 late files and two actual reads recorded as estimates.</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Actual read recorded as an estimate – A job has been logged with Gentrack to enable read types (actual/ estimate) to be recorded when completing Read Change Requests. This auto populates at present to an estimate and cannot be over-ridden.</p> <p>Late read changed requests – A job has been logged to stop any read change requests from within Gentrack being sent outside the 4 month time frame. Negotiation via email between retailers will be used instead. This will eliminate any breaches.</p>		<p>Complete by: 1/5/20</p> <p>Complete by: 1/5/2019</p>
Preventative actions taken to ensure no further issues will occur		Completion date
Trustpower will remain focused on this area. Monthly reporting will continue to occur and will monitor for breach numbers until such times as the above change requests have delivered.		Complete by: 1/5/2019
		Identified

Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clause 17&18 of schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>21 late withdrawals.</p> <p>One incorrect NW code</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating:</p>		
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 impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have updated our internal process recently to ensure that a wizard populates if a site has been with Trustpower for longer than 2 months. An email is sent to the alt retailer to ask if they will accept the NW before we send. This has proven to be a longer waiting process as response times from other retailers can be up to 4-6 weeks if there is no risk of breaching. Where acceptance is agreed the NW will be sent.</p> <p>Additional training has taken place.</p>		Completed on: 1/10/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our processes now accommodate the sending of late withdrawals with the fixes in place now. We will continue to monitor.</p>		Ongoing	

Unmetered threshold		
Non-compliance	Description	
Audit Ref: 5.2 With: Clause 10.14 (2)(b) From: 01-Jun-17 To: 31-Aug-18	1 ICP with consumption over 6,000 kWh per annum. 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	The controls are recorded as strong because they identify all examples and only one example has not been addressed by being added to the exemption list. The impact on settlement is low because the load concerned is predictable and the calculation of consumption appears sound; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
ICP 0001416961UN67D relates to 45 Chorus unmetered assets, generally cabinets. Trustpower is currently undertaking a project to identify where these cabinets are and then applying for new independent ICPS. The long term plan to resolve all issues and decommission this ICP. The EA is aware of this situation and has granted Trustpower an exemption until 2020 to resolve.		31/12/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing project as above.		31/12/2020
Remedial action status		
Identified		

Unmetered threshold exceeded		
Non-compliance	Description	
<p>Audit Ref: 5.3</p> <p>With: Clause 10.14 (5)</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>One ICP with annual consumption over 6,000 kWh per annum and remedial actions are not yet complete.</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>The controls are recorded as strong because they identify all examples and only one example has not been addressed by being added to the exemption list.</p> <p>The impact on settlement is low because the load concerned is predictable and the calculation of consumption appears sound; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
ICP 0001416961UN67D relates to 45 Chorus unmetered assets, generally cabinets. Trustpower is currently undertaking a project to identify where these cabinets are and then applying for new independent ICPS. The long term plan to resolve all issues and decommission this ICP. The EA is aware of this situation and has granted Trustpower an exemption until 2020 to resolve.		31/12/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing project as above.		31/12/2020
		Identified

Distributed unmetered load		
Non-compliance	Description	
Audit Ref: 5.4 With: Clause 11 Schedule 15.3 From: 01-Jun-17 To: 01-Jun-18	Distributed unmetered databases not accurate. Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The effectiveness of the controls is recorded as moderate as Trustpower are working to resolve the issues found. The impact on settlement is major because the incorrect submission figures are major for some databases.	
Actions taken to resolve the issue		Completion date
We recognise that this first round of new audit regime for DUML has been a learning opportunity for both participants and the EA. Trustpower is working closely with customers to reduce the instances of incorrect data.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Trustpower is committed to working with all stakeholders to ensure that databases are accurate and that robust processes are in place to guide and support the customer through the DUML process.		Ongoing
		Investigating

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>41 metering installations bridged.</p> <p>30 metering installations interfered with.</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>Controls are strong with regard to identification of bridged meters. Trustpower only initiates bridging themselves in exceptional circumstances to ensure customers have electricity supply.</p> <p>Submission information is estimated for the bridged period so the impact on submission accuracy is considered low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>These meters are bridged as we do not have the ability to accept prepay meters. When a customer moves into a property with one, but does not give us any lead time, we are acting in the customer's best interest to ensure that they have power the day they move in as opposed to choosing not to bridge and denying the customer power.</p> <p>After hours reconnection is due to AMI communication errors / issues. We continue to monitor the situation.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing monitoring and reconnecting to act in the best interest of the customer and prevent loss of power		Ongoing	

Derivation of meter readings		
Non-compliance	Description	
Audit Ref: 6.6 With: Clause 5(c) of schedule 15.2 From: 05-Jul-18 To: 06-Sep-18	Phase failure not monitored for meters read by FCLM. Potential impact: Medium Actual impact: Unknown Audit history: Once 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. The impact on settlement and participants could be minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Engagement with FCLM to confirm training will occur with respect to Phase Failure.		Completed on: 18/9/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Training records to be provided by FCLM to Trustpower annually.		Ongoing
		Identified

NHH meter reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>Meter readings not applied at the end of the day for NHH to HHR changes and decommissioning events.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>The controls are recorded as strong because accuracy is achieved for submission, billing and ICP days</p> <p>There is no impact on settlement or other participants; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>When a NHH to HHR meter change occurs, the process used by Trustpower (and most other traders) is to “remove” the NHH meter in GTV on the day before the physical meter change, which makes the NHH meter reading effective at 24:00 on that day. The day of the meter change is considered HHR all day. This process is employed because the registry won’t allow two MEPs for the same day and it also ensures consumption information and ICP days aligns with the registry. Whilst this process achieves accuracy, it is technically non-compliant, because the NHH meter reading is made effective at the beginning of the day rather than the end of the day.</p> <p>This matter is also relevant to decommissioned ICPs, where the day after the physical decommissioning is used to ensure the status aligns with the meter reading effective time (end of day).</p> <p>No further action to be taken.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Due to the nature of this technical breach, no further action		Completed
Remedial action status		
Cleared		

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Jun-17</p> <p>To: 31-Aug-18</p>	<p>HHR aggregates files do not contain electricity supplied information.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong as the issue relating to content of the aggregates file is an error in the code, Trustpower are providing submission information as expected.</p> <p>The HHR aggregates file cannot contain electricity supplied information, or other reports relying on the aggregates file will not be accurate, therefore I consider this matter does not have a risk rating.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We created our submission using submitted data as directed in the Reconciliation Managers Functional Specification and our interpretation is that this is in the best interests of the market, as it is more timely and accurate to submit using submitted rather than supplied, which is not available until a customer has been billed. The code currently contradicts the Reconciliation Managers Functional Specification and it would seem that we are following best practice to provide accurate data in a timely manner.</p> <p>Note: Our view is that we should not receive a non-compliance at this time and that the EA clarify whether submitted or supplied information should be used</p>		N/A	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
None, awaiting direction from the EA on whether submitted or supplied information should be used in this instance.		N/A	

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Sep-17 To: 16-Aug-18	Change of profile wasn't zeroed out. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls in place are rated as strong and will mitigate risk to an acceptable level. The impact is assessed to be low. Submission differences will be corrected and washed up through the revision process.	
Actions taken to resolve the issue		Completion date
This had been identified and corrected. This was an omission in one month R3 file and has been fixed in the normal wash-up process.		Completed on 20/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Additional profile checks have been implemented in the validation of submission revisions		Completed on 01/09/2018

Submission accuracy		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 19-Jun-16</p> <p>To: 16-Aug-18</p>	<p>Volume allocated to the incorrect period for four out of ten ICPs checked.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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>Controls in place are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur as was evident in the findings in relation to disconnected ICPs with consumption.</p> <p>The impact is assessed to be low. Submission differences will be corrected and washed up through the revision process.</p>	
Actions taken to resolve the issue		Completion date
Additional reporting has been put in place to identify consumption on disconnected sites.		Completed August 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Additional reporting has already been put in place to identify this prior to the audit		Completed 29/03/2018

Forward estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: Sep-17</p> <p>To: Jul-18</p>	<p>The accuracy threshold was not met for all months and revisions.</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>Controls are rated as strong as they mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as the Initial data is replaced with revised data and washed up. A small number of submissions had differences over the threshold.</p>	
Actions taken to resolve the issue		Completion date
Revisions have already been submitted		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
We have undertaken a significant amount of work to improve the accuracy of our submissions and are continually investigating improvements to our estimation processes as can be seen by our development and implementation of FE profile shapes to account for changes in average weather compared to historical records.		Complete By: 1/04/2019
		Identified

Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: Sep-17</p> <p>To: Jul-18</p>	<p>Historic estimate thresholds were not met for some revisions.</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>The controls are strong to ensure meter readings are obtained which in turn leads to a high percentage of HE.</p> <p>Trustpower were reasonably close to the target in all cases. The impact is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
None as revisions have already been submitted		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Additional checks are to be added to the R3 and R7 revision validations to highlight NSP's that are outside of required limits or within 15% of required limits. These sites will then be passed to our Meter Reading team and prioritised		Complete By: 1/11/2018
		Identified