

Compliance plan for Opunake Hydro Ltd

Title: Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 22-Dec-17 To: 01-Aug-18	Five late status updates. Six late MEP nominations. Five late trader updates. 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 rated as strong, OPHL currently supplies six ICPs and further updates to status and trader information are unlikely. The risk rating is low, because a small number and proportion of updates were late.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Provision of information to the registry manager	
Non-compliance	Description
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 19-Apr-18 To: 19-Apr-18	One late status update for a new connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong, OPHL does not intend to complete any more new connections.</p> <p>The risk rating is low, because only one status update was late.</p>	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019

Title: Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4</p> <p>Schedule 11.3</p> <p>From: 08-Dec-17</p> <p>To: 16-Apr-18</p>	<p>The AA (accept and acknowledge) AN response code was applied for six ICPs with advanced meters.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls over AN response codes are currently strong. No switching activity is expected in the foreseeable future for OPHL.</p> <p>The impact is assessed as low. Whether AMI metering is present can normally be determined from other registry information, and a small proportion of the ANs (4%) contained incorrect response codes.</p>	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019

Title: 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: 23-Feb-18</p> <p>To: 10-Aug-18</p>	<p>Seven late CS files for transfer switches.</p> <p>One CS files contained an incorrect estimated daily kWh value.</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>Controls are currently strong. No switching activity is expected in the foreseeable future for OPHL.</p> <p>As OPHL exited the retail market a large number of ICPs switched out over a short period of time, and a small number of CS files were late.</p> <p>The impact is assessed as low.</p> <ul style="list-style-type: none"> All files were provided within 11 business days of the event date. The potential impact of the incorrect average daily kWh value is expected to be low. Because the ICP has AMI metering, it is unlikely that the value provided will be used to calculate forward estimate by the gaining trader. 		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: 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: 20-Jun-18</p> <p>To: 20-Jun-18</p>	<p>One late AC file for a transfer switch.</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 currently strong. OPHL's last transfer CS had an event date of 08/08/18. Given that read renegotiation requests should be issued within four months, it is unlikely that any further RRs will be issued or received for the ICPs which have switched out. OPHL does not intend to switch in or out any other ICPs.</p> <p>The impact is assessed as low. One file was two business days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1)</p> <p>Schedule 11.3</p> <p>From: 06-Jun-18</p> <p>To: 07-Jun-18</p>	<p>The AA (accept and acknowledge) AN response code was applied for two ICPs with advanced meters.</p> <p>Potential impact: Low</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>Controls are currently strong. No switching activity is expected in the foreseeable future for OPHL.</p> <p>The impact is assessed as low. Whether AMI metering is present can normally be determined from other registry information, and only two ANs contained incorrect response codes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 13-Feb-18 To: 12-Jun-18	16 late CS files for switch moves. 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 are currently strong. No switching activity is expected in the foreseeable future for OPHL. As OPHL exited the retail market a large number of ICPs switched out over a short period of time, and a small number of CS files were late. The impact is assessed as low. All files were provided within seven business days of the event date.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 01-Aug-18 To: 01-Aug-18	One ICP did not have the agreed switch readings applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are currently strong. OPHL's last switch move CS had an event date of 08/08/18. Given that read renegotiation requests should be issued within four months, it is unlikely that any further RRs will be issued or received for the ICPs which have switched out. OPHL does not intend to switch in or out any other ICPs.</p> <p>The impact is assessed as low. The difference between the applied and agreed readings was 929 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Losing trader provision of information - gaining trader switch			
Non-compliance	Description		
<p>Audit Ref: 4.13</p> <p>With: Clause 15</p> <p>Schedule 11.3</p> <p>From: 23-Jan-18</p> <p>To: 03-May-18</p>	<p>The AA (accept and acknowledge) AN response code was applied for two ICPs with advanced meters and one ICP with unmetered supply.</p> <p>Potential impact: Low</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>Controls are currently strong. No switching activity is expected in the foreseeable future for OPHL.</p> <p>The impact is assessed as low. Whether AMI metering or unmetered load is present can normally be determined from other registry information, and only four ANs contained incorrect response codes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.	Jan 2019	

Title: Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 23-May-17</p> <p>To: 25-Jun-18</p>	<p>Two late NW files.</p> <p>Potential impact: Low</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>Controls are currently strong. OPHL's last CS had an event date of 08/08/18. Given that withdrawal requests should be issued within two calendar months, it is unlikely that any further NWs will be issued or received for the ICPs which have switched out. OPHL does not intend to switch in or out any other ICPs.</p> <p>The audit risk is rated as low, because only two of the 91 NW files were issued late.</p>	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019

Title: Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Nov-17</p> <p>To: 31-Jul-18</p>	<p>Datacol did not conduct checks for phase failure during the period where AMI meters were supplied.</p> <p>Some customer readings prior to 09/02/18 were treated as actual without being appropriately validated for ICP 0002995060CN7C2.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be strong. No manually read NHH ICPs are supplied, and no customer acquisitions are planned.</p> <p>The impact is assessed to be low.</p> <ul style="list-style-type: none"> Phase failure is often not indicated on non-AMI meters. No ICPs have been manually read since the retail customers switched out effective from 01/08/18. ICP 0002995060CN7C2 has received AMI readings since 09/02/18. 		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Interrogate meters once	
Non-compliance	Description
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 17-Jul-18</p> <p>To: 31-Jul-18</p>	<p>One ICP did not have an actual read recorded during the period of supply.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are currently rated as strong. Only one NHH ICP is supplied and OPHL does not intend to acquire any new ICPs. The ICP has AMI metering and reads are being obtained.</p> <p>The impact is assessed as low, as one ICP which was supplied for 15 days did not have an actual reading during the period of supply.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: NHH meters 90% read rate			
Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 17-Jul-18</p> <p>To: 31-Jul-18</p>	<p>For two NSPs with less than 90% of ICPs read in the previous four months, exceptional circumstances did not exist.</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>Controls are currently rated as strong. Only one NHH ICP is supplied and OPHL does not intend to acquire any new ICPs. The ICP has AMI metering and reads are being obtained.</p> <p>The impact is assessed as low, as two ICPs were affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 01-Nov-17 To: 31-Jul-18	Some customer readings prior to 09/02/18 were treated as actual without being appropriately validated for ICP 0002995060CN7C2. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are assessed to be strong. No manually read NHH ICPs are supplied, and no customer acquisitions are planned. The impact is assessed to be low. ICP 0002995060CN7C2 has received AMI readings since 09/02/18.	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019
		Identified

Title: Electronic meter readings and estimated readings	
Non-compliance	Description
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Nov-17 To: 31-Jul-18	Event log information is not received from Arc for NHH meters. Event log information provided by Metrix and WEL Networks is not routinely reviewed for NHH meters. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are currently rated as strong, because meter event information is received and reviewed for all ICPs currently supplied. The non-compliance relates to some ICPs with Arc, Metrix, or FCLM meters which have switched out.</p> <p>The audit risk rating is low, because other validations in place are comprehensive and are likely to identify any consumption related issues, therefore the potential impact on settlement is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Calculation of ICP days			
Non-compliance	Description		
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Dec-17</p> <p>To: 30-Jun-18</p>	<p>ICP days are not calculated correctly for the day of decommissioning or the day of downgrade.</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>Controls are currently rated as strong, because no downgrades or decommissions are expected for the ICPs currently supplied.</p> <p>The audit risk rating is low, because a small number of ICPs and days were affected, and the potential impact on settlement is minor. One downgrade from HHR to NHH, and nine updates to inactive ready for decommissioning status were identified during the audit period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.	Jan 2019	

Title: HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Dec-17 To: 30-Nov-18	HHR aggregates file does not contain electricity supplied information. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, and the impact as low, because the requirement to report electricity supplied information is an error in the code, and EMS is providing submission information as expected. In most cases, billed volumes would match reported volumes.	
Actions taken to resolve the issue		Remedial action status
		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.	Jan 2019	

Title: Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Dec-17</p> <p>To: 30-Nov-18</p>	<p>Historic estimate may be labelled as forward estimate where SASV are not available.</p> <p>ICP days are not calculated correctly for the day of decommissioning or the day of downgrade.</p> <p>Some customer readings prior to 09/02/18 were treated as actual without being appropriately validated for ICP 0002995060CN7C2.</p> <p>The agreed switch readings were not applied for ICP 0000171354TR14A.</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>Controls are currently rated as strong and the impact is assessed to be low.</p> <ul style="list-style-type: none"> One NHH ICP is currently supplied, and receives AMI readings each month. All other NHH ICPs have switched out, and are 100% historic estimated. The mislabelled historic estimate has no impact on the volumes reported. No downgrades or decommissions are expected for the ICPs currently supplied. A small number of ICPs and days were affected, and the potential impact on settlement is minor. One downgrade from HHR to NHH, and nine updates to inactive ready for decommissioning status were identified during the audit period. ICP 0002995060CN7C2 has received AMI readings since 09/02/18. The difference between the applied and agreed readings for ICP 0000171354TR14A was 929 kWh. 	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019
		Identified

Title: Permanence of meter readings for reconciliation			
Non-compliance	Description		
<p>Audit Ref: 12.8</p> <p>With: Clause 4</p> <p>Schedule 15.2</p> <p>From/to: Apr-17 r14 and May-17 r14</p>	<p>Some estimated readings are not replaced with permanent estimates by revision 14.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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. One NHH ICP is currently supplied, and AMI readings are being received.</p> <p>The risk rating is low. While there is no process to enter forward estimates, there are good controls over read attainment. It is expected OPHL's current NHH ICP will have 100% historic estimate by revision 14. All other NHH ICPs have switched out on permanent estimate or actual readings and will have 100% historic estimate for all revisions submitted after they switched out.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Historical estimates and forward estimates	
Non-compliance	Description
<p>Audit Ref: 12.10</p> <p>With: Clause 3</p> <p>Schedule 15.3</p> <p>From: 01-Jul-17</p> <p>To: 11-Jul-18</p>	<p>Historic estimate may be labelled as forward estimate where SASV are not available.</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 historic and forward estimate is correctly identified most of the time. One NHH ICP is currently supplied, and receives AMI readings each month. All other NHH ICPs have switched out, and are 100% historic estimated.</p> <p>The impact is assessed to be low because the mislabelled historic estimate has no impact on the volumes reported.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	

Title: Forward estimate process			
Non-compliance	Description		
<p>Audit Ref: 12.12</p> <p>With: Clause 6</p> <p>Schedule 15.3</p> <p>From: 01-Aug-17</p> <p>To: 31-Aug-17</p>	<p>The accuracy threshold was not met for one balancing area for month.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are currently rated as strong. One NHH ICP is currently supplied and no further customer acquisitions are planned. It is very unlikely that OPHL will breach the thresholds in future.</p> <p>The issue occurred due to a misread for a recent switch in, and OPHL quickly obtained subsequent readings which confirmed the high read was a misread and no RR was required.</p> <p>Initial data is replaced with revised data, and washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.	Jan 2019	

Title: Historical estimate reporting to RM			
Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: Clause 10 Schedule 15.3</p> <p>From: Mar-17 (r14), Apr-17 (r14), May-17 (r14), Oct-17 (r7), Nov-17 (r7), Dec-17 (r7), Mar-18 (r3), Apr-18 (r3), May-18 (r3)</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>Controls are rated as strong. One NHH ICP is currently supplied, and AMI readings are being received.</p> <p>The risk rating is low. It is expected OPHL's current NHH ICP will meet the historic estimate requirements for all revisions. All other NHH ICPs have switched out on permanent estimate or actual readings and will have 100% historic estimate for all revisions submitted after they switched out.</p> <p>I note that actual historic estimate will be slightly higher than the levels reported because of the incorrect classification of unmetered historic estimate as forward estimate.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All the identified issues are expected to be removed going forward due to exiting the majority of our ICP's and change to a new reconciliation agent.		Jan 2019	