

Compliance Plan Electricity Ashburton Distributor 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 01-Jun-21 To: 15-Sep-22	One ICP with the incorrect initial electrical connection date recorded. 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 rated as strong as they will eliminate risk to an acceptable level. The audit impact is assessed to be low due to one ICP with no initial electrical connection date recorded.	
Audit Comments for reference	Completion date	Remedial action status
We have undertaken a review of EA Networks' processes to identify how the non-compliance occurred.	November 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The non-compliance occurred as a result of a data entry error. Our daily discrepancy reporting catches and highlights situations where a retailer claims a new ICP in the Active state where no initial energization date is recorded. We will continue to utilize our discrepancy reporting.	November 2022	

Monitoring of "new" & "ready" statuses			
Non-compliance	Description		
Audit Ref: 3.14 With: Clause 15 Schedule 11.1 From: 01-Jun-21 To: 15-Sep-22	10 ICPs at "ready" status not followed up with the nominated trader. Potential impact: Low Actual impact: Low Audit history: One 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. EA Networks must follow-up with the customer, if the trader does not accept responsibility. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have undertaken a review of EA Networks' processes to identify how the non-compliance occurred.		November 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The ICPs relate to an historic work programme of splitting ICPs. Retailers and customers are reluctant to adopt the additional ICPs and these remaining 10 have proven problematic. The outstanding ICPs were not followed up for a period following staff changes in the Commercial department. They have been added to the current work programme and will be followed up again.		November 2022 to February 2023	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Jun-21</p> <p>To: 15-Sep-22</p>	<p>36 late address events.</p> <p>18 late network updates to distributed generation details.</p> <p>Three late network updates to fields other than distributed generation details.</p> <p>40 late pricing events.</p> <p>Five late updates to decommissioned status.</p> <p>Potential impact: Low</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>Controls are rated as moderate because are sufficient to ensure that the registry is updated within three business days most of the time.</p> <p>The risk rating is low because there may be a minor impact on other participants. Processing corrections improves compliance with the completeness and accuracy requirements.</p>	
Actions taken to resolve the issue		Completion date
We have undertaken a review of EA Networks' processes to identify how the non-compliance occurred.		November 2022
Preventative actions taken to ensure no further issues will occur		Completion date
<p>In some situations, we are unable to avoid backdated transactions on the registry, including:</p> <ul style="list-style-type: none"> Where the registry prevents us from loading a decommissioning transaction until after the retailer has made its updates. In these situations, we add "DECOM" to the property description field, and our daily discrepancy reporting lets us know when the update can be applied. Where customers install solar and don't tell us they have done so we are unable to update the registry. We reinforce the requirement to advise us when generation is installed in our application approvals, and we follow up situations where a retailer advises that export metering has been installed. Where a retailer asks us to reverse and then reapply transactions so that it can correct its transactions. <p>In other situations, the updates are late as a result of delays in our field service staff processes, and we have taken the opportunity to highlight the need for timely updates from our contractors.</p> <p>We have added a process to report on late transactions on a monthly basis, so that trends can be identified and addressed, and information collated for subsequent audits.</p>		November 2022
		Identified

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1)(o)&(p) Schedule 11.1 From: 01-Jun-21 To: 15-Sep-22	One ICP with the incorrect initial electrical connection date recorded. 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 rated as strong as they will eliminate risk to an acceptable level. The audit impact is assessed to be low due to one ICP with an incorrect initial electrical connection date recorded.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have undertaken a review of EA Networks' processes to identify how the non-compliance occurred.	November 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The issue was an isolated data entry error for a single ICP. Our planned monthly review of registry audit reports will identify any future occurrences, allowing us to correct and subsequent errors.	From November 2022	