

# Compliance Plan NZAL Distributor 2022

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1) From: 01-Mar-20 To: 31-Dec-22	Two active ICPs with duplicate addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong, as they are robust and mitigate risk to an acceptable level. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
The duplicate address were found during the audit, this was a result of someone putting the unit number in the user reference field.		March-22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will look to put automated monitoring in place for duplicate address. We have started reviewing ICPs we have inherited from local networks building by building and will improve the records.		Ongoing	

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3) From: 01-Mar-20 To: 31-Dec-22	Two ICPs created late. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong, as they are sufficient to ensure ICPs are created on time most of the time. The risk is low as only two ICPs were affected, and additional information required was actively followed-up by NZAL.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICPs are generally created within 3 business days. Once all information was obtained the ICPs were generated.	During audit.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have hired another resource in operations team to provide further capacity. Investigating creating website application form for individual ICP requests	Ongoing	

<b>Timeliness of Provision of ICP Information to the registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1  From: 01-Mar-20 To: 31-Dec-22	Information not provided to the registry prior to electricity being traded for nine ICPs.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong, as they are robust and mitigate risk to an acceptable level.  The audit risk rating is deemed to be low as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The ICP was moved to ready as soon as we became aware that it was still sitting at NEW upon confirmation of the electrical connection.	21/09/2020	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
This was human error and for new Embedded Networks where we have issued NEW ICP's in preparation for the network to go live at a later date all ICP's will be moved to READY from the NSP go live date.	2020	

<b>Timeliness of Provision of Initial Electrical Connection Date</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Mar-20 To: 31-Dec-22	18 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong, as they are sufficient to prevent the late updates most of the time, five ICPs checked were the result of a trader request. The audit risk rating is deemed to be low as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
IED was initially input within 1BD, the retailer requested we reverse our network event as they had claimed on wrong retailer code. Once we input the network event again it looked like we updated late.	During Audit	Disputed
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Non issue, caused by retailer asking us to reverse events to accommodate their errors.	N/A	

ICP location address			
Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Mar-20 To: 31-Dec-22	Two active ICPs with duplicate addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong, as they are sufficient to ensure addresses are unique most of the time. The risk is low as a small number of ICPs are affected, and the registry has been updated.		
Actions taken to resolve the issue		Completion date	Remedial action status
The duplicate address were found during the audit, this was a result of someone putting the unit number in the user reference field		March-22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will look to put automated monitoring in place for duplicate address. We have started reviewing ICPs we have inherited from local networks building by building and will improve the records.		Ongoing	

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 10.25(1) and 10.25(3) From: 01-Mar-20 To: 31-Dec-22	The meter installation certification expiry date advised late for NSP NPS0011. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. 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
Tenco enters the metering certification from the MEP as soon as we receive and process the paperwork, in some cases the MEP's paperwork is late thus causing Tenco to be non-compliant.	During the audit period	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Tenco continue to proactively follow up for meter paperwork with the MEP when it has not been received. Contracting with the MEP's directly from the 01/10/2021 we anticipate should assist with the timeliness of meter install paperwork. It is worth noting due to covid there is backlogs across all businesses	Ongoing	