

Compliance plan for Northpower - 2022

Non-compliance	Description	
Audit Ref: 1.11 With: 16A.11 From: 01-Apr-21 To: 15-Feb-22	On 01/04/2021 Gentrack was replaced by Axos Registry Manager which had a significant impact on processes covered by this audit. A Material Change Audit was not conducted. Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	We recorded controls as none. No Material Change Audit was conducted. No impact on settlement outcomes therefore audit risk rating recorded as low	
Actions taken to resolve the issue	Completion date	Remedial action status
Northpower did not consider this to be a material change as defined in the Code as it was unlikely that the change would affect the ability of the Northpower to comply with the Code because: <ol style="list-style-type: none"> 1) The new platform was thoroughly tested; and 2) We retained the ability to make data updates and changes in the Registry through the Electricity Authority's web based interface 3) The change in platform did not impact on the actual processes carried out, only the platform used to execute them on the Electricity Registry. 	31/3/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Significant testing was completed by Northpower and Axos prior to the 1 April 2021 go-live date as a control which mitigated risk	31/3/2022	

Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) From: 01-Mar-21 To: 15-Feb-22	Relatively low number of information inaccuracies identified during the audit 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. During the audit evidence was produced showing considerable steps taken to achieve accuracy, exception reporting in place and correction of any errors discovered. No impact on settlement outcomes. Audit risk rating low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Refer to Northpower's comments on the individual non-compliance areas in this report (Audit Ref: 3.4, 3.5, and 4.1)	31/3/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer to Northpower's comments and corrective actions to be taken in the individual non-compliance areas in this report (Audit Ref: 3.4, 3.5, and 4.1)	31/3/2023	

Non-compliance	Description		
Audit Ref: 3.4 With: 7(2) of Schedule 11.1 From: 23-Apr-21 To: 27-Sep-21	4 ICPs did not have the status "Ready" assigned prior to electricity being traded at the ICP. 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 recorded as strong. During the audit evidence was produced showing considerable steps taken to achieve accuracy, exception reporting in place and correction of any errors discovered. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><i>Northpower does not accept that this is a non-compliance on their part.</i></p> <p>For both the Platinum Power and Mercury Energy ICPs Northpower backdated the "Ready" status event in the Registry on advice from the Electricity Authority to prior to the electrical connection date (and prior to the date "acceptance of responsibility" was actually received by Northpower) so that the correct Active status date could be recorded in the Registry by each trader.</p> <p>The reconciliation of the electricity used at the ICPs was deemed to be of more importance than the correct date (after trader accepted was received) of Northpower's "Ready" status event.</p>		27/1/2022	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Northpower alleged a Code breach against Platinum Power with the outcome that the Electricity Authority issued a warning letter to Platinum Power as a result of their breach of the Code.		27/1/2022	

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 30-Mar-21 To: 08-Feb-22	22 ICP (2.6% of all new connections) had the IECD uploaded to the registry more than 10 days after the event date 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 Northpower has well documented processes, information recording and exception reporting. The main issue appears to be receiving late data from third parties. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
A notice was sent to all Contractors living on the Northpower Network to remind them of their obligation to return information in a timely manner .		April 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing reporting is created by Northpower showing any breaches where information has been provided late. Where ongoing issues with provision of timely information are observed reminders are sent. Incremental improvement is being observed over time.		On-going	

Non-compliance	Description	
Audit Ref: 4.1 With: 8(1)(b)&(4) of Schedule 11.1 From: 01-Mar-21 To: 15-Feb-22	Registry event updates backdated greater than three days. 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	Controls are recorded as moderate as exception reporting and follow up is evident. Unfortunately, efforts made to correct and maintain registry information to be compliant with clause 11.2 can result in updates over 3 days and consequent non-compliance. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low	
Actions taken to resolve the issue	Completion date	Remedial action status
Northpower will continue to review processes to enable us to meet the Code timeframes regarding Registry updates. However many of the Registry data updates mentioned in this non-compliance are based on Notification Files received from the Registry – the information from other participants in these files are the trigger for the Northpower Registry update.	31/3/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The majority of non-compliances (Network and Address events) relate to the installation of Distributed Generation at existing ICPs. Northpower understands that other Distributors have the same issues relating to late Registry updates with this data due to there being a disconnect between the installation of distributed generation which does not require a Warranted Person, and the Distributor’s obligation to update the Registry.</p> <p>We will continue to look at options for improving the timeliness of Registry data updates within these constraints.</p> <p>Although we could create the Address Event related to generation installation or when an ICP moves from a BTS to permanent effective “today”, this would cause a disconnect between the actual date of the change and the Address Event effective date. We will investigate further whether this will cause issues for other participants or users of the Registry data.</p>	31/3/2023	