

Compliance Plan for Smart Net Distributor – 2022

Provision of information on dispute resolution scheme			
Non-compliance		Description	
Audit Ref: 2.4 With: 11.30A From: 01-Apr-21 To: 14-Jun-22		Information about Utilities Disputes is not consistently provided when customers telephone with faults. 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 strong and the impact is low, because SMRT meets all the other requirements to provide information on Utilities Disputes.	
Actions taken to resolve the issue		Completion date	Remedial action status
We have added the relevant wording to our faults call centre greeting. Initially the calls were routed to go straight to an operator which was not as reliable a method to impart UDL info. This does add slightly more time taken to answer a call but on balance is a more effective implementation of the Code requirements.		17/6/22	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
See above, this is now covered.		17/6/22	

Timeliness of initial electrical connection date	
Non-compliance	Description
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 06-Jan-21 To: 30-Mar-22	21 ICPs had their initial electrical connection dates updated more than ten business days after initial electrical connection. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate as SMRT is actively seeking this information but when other participants are slow to provide the information this causes SMRT to be non-compliant.</p> <p>The audit risk rating is low because the non-compliance has no direct impact on submission but does limit the ability of traders to validate their active dates. The correct dates were populated within 29 business days of initial electrical connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This is an ongoing issue; over the years we have put greater controls in place that have generally improved our level of compliance and we are pleased to report that while still not perfect, 89% (164 of 185) of ICPs were updated within 10 business days which is an improvement of from the previous audit.</p>		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above.		ongoing	

Connection of NSP that is not point of connection to grid	
Non-compliance	Description
<p>Audit Ref: 3.9 With: 10.30</p> <p>From: 29-Jul-21 To: 19-Aug-21</p>	<p>The meter installation certification expiry date advised 15 days after certification for NSP AKK0011.</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>The controls are rated as strong, as they are sufficient to ensure updates are on time most of the time.</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
Paperwork was requested via Meridian several times prior to certification date however the request that was made which ultimately resulted in receiving paperwork was only made 2 weeks after the certification was done. This solved the issue of not having paperwork but not the late update.	19/08/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are well aware of the requirement and will continue to pressure agents to provide paperwork in a timely fashion. We will also work to foster better communication with contractors on site as to when meters are being installed so that we can ensure we are requesting paperwork at the right time.	ongoing	

Changes to registry information	
Non-compliance	Description
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 26-Aug-21 To: 04-Mar-22	Six network updates and two status updates were made more than three business days after the event date. 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	The controls are rated as moderate as the process is largely manual hence errors can occur, but controls are in place to mitigate risk most of the time. The audit risk rating is low the late changes are small in volume.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Network - distributed generation is becoming more prevalent and it is apparent that our processes for updating the registry in this area are lacking; based on the findings of this audit we have improved the flow of information by including the party responsible for registry updates into the approval for DG provided to applicants which will allow better monitoring and preemptive action.</p> <p>The late decommissioning of ICPs in this case were caused in both cases by electricians removing temporary BTS connections but only notifying us or the retailer much later. In addition there were delays in updating the registry due to various participants needing to reverse entries. The actions taken at the time were to update the registry with the relevant dates once the information was available and update became possible.</p>	Various	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>As above for DG. For decommissioning both cases here were, in our view, beyond our control</p>	ongoing	

Distributors to Provide ICP Information to the Registry manager	
Non-compliance	Description
<p>Audit Ref: 4.6 With: 7(1) Schedule 11.1 From: 06-Dec-21 To: 10-Jun-22</p>	<p>ICPs 8000000305SNEF0 and 5000000108SN485 had incorrect initial electrical connection dates, which were updated during the audit. ICP 5000000063SNCA5 had its generation capacity recorded as 3.83 kW instead of 3.68 kW and was corrected during the audit.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are rated as moderate as the process is largely manual hence errors can occur, but controls are in place to mitigate risk most of the time.</p> <p>The audit risk rating is low because the non-compliance has no direct impact on submission or a trader's ability to identify ICPs with distributed generation but does limit the ability of traders to validate their active dates.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Info was updated as the errors came to light.	3/6/22	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The generation capacity figure was human error. We believe that the better process and controls in relation to DG as mentioned in part 4.1 above will help to prevent this sort of error reoccurring. This affected one ICP of six that were updated during the period.</p> <p>The IECD figures were updated as the result of an investigation triggered by the audit findings; generally we may be delayed by getting info but not incorrect on the date. We believe that processes currently in place as mentioned in 3.5 above that have improved our overall timeliness will also assist here.</p>	ongoing	

Updating loss factors		
Non-compliance	Description	
<p>Audit Ref: 5.2 With: 22 Schedule 11.1</p> <p>From: 01-Aug-21 To: 01-Apr-22</p>	<p>Loss factor changes for SNL01, SNLW1, SNVL1, SNVL2 and SNVL4 were not updated on the registry at least two months prior to coming into effect.</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	
<p>Low</p>	<p>The controls are recorded as moderate. The changes were identified and provided to participants but were not sent to TEG to update the registry at least two months prior to the change. The missing notifications were identified during an internal review and TEG updated the registry as soon as possible once notification was received.</p> <p>The impact is low because the notifications were all provided within 11 calendar days of the required date and more than 6-7 weeks before they came into effect.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Unfortunately, this is the human error; we neglected to update TEG and therefore the registry even though everything was done and ready to go. The inconsistencies found later were typos which were captured and updated at the time.</p>	1/4/22	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We have identified these issues as time and pressure related. While the process will always be somewhat manual, we have dedicated more internal resource to take some of the pressure off, undertake more timely and better checking, and therefore remove these needless errors.	ongoing	

Notice of supporting embedded network NSP information		
Non-compliance	Description	
Audit Ref: 6.4 With: 26(4) Schedule 11.1 From: 01-May-21 To: 07-Jul-21	The LE ICP for DST0011 was provided on 7 July 2021 when the NSP transfer date was 1 May 2021. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because almost all information was provided on time. There is no impact because the reconciliation manager already held the LE ICP.	
Actions taken to resolve the issue	Completion date	Remedial action status
The LE ICP was supplied as soon as it was realised it was missing.	07/07/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This appears to be a gap in process when transferring an NSP from another provider, and is more to do with the mechanics of the NSP table etc and the assumption that as the LE ICP doesn't change, the information was already recorded. This gap has been noted and shouldn't reoccur.	07/07/21	

Responsibility for metering information for NSP that is not a POC to the grid			
Non-compliance		Description	
Audit Ref: 6.8 With: 10.25(1) and 10.25(3) From: 11-Jul-21 To: 24-Mar-22		Meter certification details were not provided to the reconciliation manager within 20 business days of certification for ETC0011. 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 because one update was late. The audit risk rating is low because the metering was certified at all times.	
Actions taken to resolve the issue		Completion date	Remedial action status
We have a continued issue with MEPs performing partial or complete recertification work significantly before the expiry date of the existing certification which makes it difficult to anticipate when to ask for documentation. In this case the new date was picked up as part of a routine review and updated accordingly.		24/03/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have asked the MEPs to notify us of any changes to certification as they occur rather than relying on known expiry dates and asking Meridian.		ongoing	

Responsibility for metering information when creating an NSP that is not a POC to the grid			
Non-compliance		Description	
Audit Ref: 6.9 With: Clause 10.25(2) From: 29-Jul-21 To: 19-Aug-21		The meter installation certification expiry date for AKK0011 was provided to the reconciliation manager more than five business days after certification. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as strong because one update was late. The audit risk rating is low because the metering was certified at all times.	

Actions taken to resolve the issue	Completion date	Remedial action status
Paperwork was requested via Meridian several times prior to certification date however the request that was made which ultimately resulted in receiving paperwork was only made 2 weeks after the certification was done. This solved the issue of not having paperwork but not the late update.	19/08/21	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are well aware of the requirement and will continue to pressure agents to provide paperwork in a timely fashion. We will also work to foster better communication with contractors on site as to when meters are being installed so that we can ensure we are requesting paperwork at the right time.	ongoing	

Confirmation of consent for transfer of ICPs		
Non-compliance	Description	
Audit Ref: 6.12 With: 5 and 8 Schedule 11.2 From: 01-May-21 To: 01-May-21	Trader consent was not obtained for the transfer of ICP 0002511389TC56C from TENC-DST0011 to SMRT-DST0011. 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 strong, one ICP was missed from the notification due to an administrative error when creating the ICP list. The impact is low because Meridian consented to all other ICPs requested being transferred.	
Actions taken to resolve the issue	Completion date	Remedial action status
This is extremely frustrating and while we cannot dispute the facts, retailer acceptance is seldom if ever on an ICP by ICP basis and thus acceptance by Meridian was really acceptance of all ICPs.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Moving forward we will add a line to transfer requests to the extent that the request covers the listed ICPs as well as any others that the relevant retailer supplies at the time of transfer.	ongoing	

