

## Compliance plan for Vector– 2022

Non-compliance	Description		
Audit Ref 2.1 With: 11.2(1)  From: 01-Aug-21 To: 31-Jul-22	Inaccurate or missing information in the registry of status, distributed generation, and Initial Electrical Connection Dates not populated in the Registry  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate overall but some opportunities for further improvements are in progress which will strengthen controls once in place. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer actions noted in audit ref tables 3.3, 3.4, 3.5, 3.13, 4.1, 4.2, 4.4 and 4.6.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			

Non-compliance	Description		
Audit Ref 2.2 With: 11.2(2)  From: 01-Aug-21 To: 31-Jul-22	Incorrect or missing historical information in the registry across a number of areas  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 overall but some opportunities for further improvements are in progress which will strengthen controls once in place. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Distributed Generation: Increase frequency of follow up with customers for missing COCs to be monthly at a minimum and issue deadline to customer for response.  IECD: Increase frequency of follow up with the warranted person for missing IECD to weekly.  We will continue to use the audit compliance report to pick up missing data.		30/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
N/A			

Non-compliance	Description		
Audit Ref 3.2 With: 11.5(3)  From: 01-Aug-21 To: 31-Jul-22	No notification of delay to ICP creation for 25 ICPs requested by traders Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as moderate. They will mitigate non-compliance most of the time but there is room for improvement. Audit risk rating is assigned as low. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
N/A			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Further training to be provided to staff to ensure requestor is always included in any communications regarding delays.  Spot checking of late or on hold requests will be carried out to ensure notifications are being sent.		30/11/2022	

Non-compliance	Description		
Audit Ref 3.3 With: 11.7  From: 01-Aug-21 To: 31-Jul-22	1,029 ICPs with no initial electrical connection date populated Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate overall but some opportunities for further improvements are in progress which will strengthen controls once in place. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
IECD: Refer to notes on audit ref 2.2. Follow up frequency to be increased.		30/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
UML: Online application form to be updated to require UML details to be supplied upon application.		31/07/2023	

Non-compliance	Description		
Audit Ref 3.4  With: 7(2) of Schedule 11.1  From: 01-Aug-21 To: 31-Jul-22	5 ICPs not updated on the registry prior to commencement of trading  Potential impact: Low  Actual impact: Low  Audit history: Twice times  Controls: Strong  Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as strong. Significant decrease since the last audit. The audit risk rating is low as the incorrect information for 5 residential ICPs has a small or no effect on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
N/A			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process to be implemented to track status of ICPs created in NEW to ensure change to READY status is completed as soon as installation of the network supply point has been completed and is ready for livening.		30/11/2022	

Non-compliance	Description		
Audit Ref 3.5  With: 7(2A) of Schedule 11.1  From: 01-Aug-21 To: 31-Jul-22	<ul style="list-style-type: none"> <li>• 2,824 late of updates initial electrical connection dates in the registry, some of them are historic updates</li> <li>• 1,029 ICPs do not have IECD recorded</li> </ul> Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate. The warranted person (livening person) has an obligation to provide IECD information to Vector, on behalf of the trader. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
IECD: Refer to notes on audit ref 2.2. Follow up frequency to be increased.		30/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			

Non-compliance	Description		
Audit Ref 3.13 With: 13 of Schedule 11.1 From: 01-Aug-21 To: 31-Jul-22	5 ICPs had the "NEW" status incorrectly recorded in the registry 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. Additional process for retailer requiring early release of ICPs to issue CTs. The audit risk rating is low as it is a small number ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Setup report for monitoring ICPs with a status of New to be reviewed weekly and ICPs updated where required.		30/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
N/A			

Non-compliance	Description		
<p>Audit Ref 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 01-Aug-21</p> <p>To: 31-Jul-22</p>	<ul style="list-style-type: none"> <li>Registry event (NSP change, address, distributed generation, decommissioning) updates backdated more than three business days</li> <li>Incorrect effective event date for the NSP change for longer than 10 business days</li> </ul> <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		
<p><b>Low</b></p>	<p>The controls are rated as moderate as the checks in place will mitigate risk most of the time. A new process for pricing events was introduced. Overall number of late updates significantly decreased in comparison with the last audit period. Audit risk rating is recorded as low, level of compliance is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Distributed Generation: Refer to notes on audit ref 2.2. Follow up frequency to be increased.</p> <p>NSP: Data analysis is completed to identify the ICP records with incorrect effective network event dates for NSP changes. These dates are appropriately remediated in Gentrack.</p>		<p>30/11/2022</p>	<p>Identified</p>
<p>NSP: Data analysis is completed to identify the ICP records with incorrect effective network event dates for NSP changes. These dates are appropriately remediated in Gentrack.</p>		<p>31/03/2023</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Address: We will no longer backdate address changes. The process for the co-ordinate changes has been altered to ensure updates are processed same day and not backdated.</p> <p>NSP: Business analysis work is completed, and a system solution implemented in order to prevent ICP incorrect network event dates going forward.</p>		<p>Completed</p>	
<p>NSP: Business analysis work is completed, and a system solution implemented in order to prevent ICP incorrect network event dates going forward.</p>		<p>30/06/2023</p>	



Non-compliance	Description		
Audit Ref: 4.2 With: 7(1)(b)of Schedule 11.1  From: 01-Aug-21 To: 31-Jul-22	8 out of 21 ICPs sampled were mapped to an incorrect NSP  Potential impact: Low  Actual impact: Low  Audit history: Multiple times previously  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate overall but some opportunities for further improvements are in progress which will strengthen controls once in place. Historic ICPs that are potentially mis-mapped are continually being worked through. Vector uses the Audit Compliance report to correct historic incorrect mapping. The risk rating is low as Vector has one balancing area per network and therefore an incorrect NSP has no direct impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
To mitigate the number of errors, the EA “Registry Audit Comparison Report – NSP Discrepancies” report is run for VECT and UNET monthly and the required remediations are completed.  There are other reports set up by Vector that show ICPs on Pending Transformers. These reports are run on a weekly basis and the required remediations are completed.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above		Ongoing	

Non-compliance	Description		
Audit Ref 4.4 With: 2 of Schedule 11.1 From: 01-Aug-21 To: 31-Jul-22	1,532 ICPs with addresses that are not readily locatable 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 Vector is still working through historic ICPs. The audit risk rating is low as this has no direct impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an ongoing piece of work. Vector continue to work on trying to identify and correct these historical address issues and are requesting help from the traders to resolve these.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Further training to be provided to staff to ensure duplicates are not created.		30/11/2022	

Non-compliance	Description		
Audit Ref 4.6 With: 7(1)of Schedule 11.1  From: 01-Aug-21 To: 31-Jul-22	<ul style="list-style-type: none"> <li>• Discrepancies for a number of ICPs where the Initial Electrical Connection date is different to the Metering Installation Certification date or the Active date (Status Event Date)</li> <li>• 4 ICPs (LE) incorrectly had the Dedicated NSP flag set to “N”</li> <li>• 5 ICPs (GN) incorrectly had Dedicated NSP flag set to “Y”</li> <li>• For small number of ICPs incorrect solar kW are recorded in the registry</li> <li>• Potential impact: Low</li> </ul> <p>Actual impact: Low            Audit history: Multiple times            Controls: Moderate            Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as moderate. Vector continues to improve monitoring of inaccuracies.</p> <p>The audit risk rating is assessed to be low as the discrepancies have only a minor impact to the market.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>NSP Flag:</b> All errors have been fixed.</p> <p><b>Distributed Generation:</b> For kW discrepancies between the inverter and plan generation, please refer notes below in preventative actions box.</p> <p>We are currently investigating the discrepancies with L and O in the registry and will have these fixed immediately.</p> <p><b>IECD discrepancies:</b> Checking with warranted persons and traders to confirm the correct date and will update registry where necessary.</p>		Completed	Identified
		Not applicable	
		19/10/2022	
		30/11/2022	
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><b>NSP Flag:</b> ICPs were originally correctly flagged as Y. They were changed to N due to a system error. We are currently investigating a fix for the issue. In the meantime, we will run a report to identify any with issues and will resolve.</p> <p><b>Distributed Generation:</b> Vector always use the inverter rating for the nameplate capacity due to the following reasons:</p> <ol style="list-style-type: none"> <li>1. The output can never be greater than the inverter rating.</li> <li>2. As an extreme case, even if we have no panels/energy sources sitting behind the inverter, it can still absorb/inject reactive power up to its rating. This will have an effect on the Vector Network voltage.</li> <li>3. A customer may install additional panels/energy sources and not notify Vector.</li> <li>4. A customer may attach a DIY battery to the inverter increasing the potential maximum kW output of the system.</li> </ol> <p>In the cases where there are oversized inverters, it is usually to meet their reactive power requirements (4777.2) whilst still outputting 100% of the available energy from the source. The inverter therefore operates at 100% of its MVA rating which is more than the maximum MW of the plant.</p> <p>We believe this approach of using the inverter rating is more conservative/less risky than using the MW of the plant.</p> <p><b>Missing distributed generation:</b> Audit compliance report to be used to identify ICPs where trader has indicated DG monthly. Retailers and customers to be contacted to follow up on applications and COCs.</p> <p><b>IECD discrepancies:</b> Audit compliance report to be used to identify discrepancies and warranted person and traders to be contacted on a monthly basis.</p>	<p>Unknown – pending investigation</p> <p>Not applicable</p> <p>02/11/2022</p> <p>07/11/2022</p>	
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Non-compliance	Description		
Audit Ref: 4.9 With: 14 of Schedule 11.1 From: 01-Jul-21 To: 31-Jul-22	Some ICPs are loaded to the registry with the status READY before being accepted by trader in Siebel. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. There is a new connections process preventing traders from electrically connecting an ICP before accepting any responsibility. The audit risk rating is low because a timing issue has no direct impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Vector believe that our current process provides quicker service and delivery of ICPs and livening for both retailers and consumers. Retailers still have an opportunity to decline any ICPs they do not wish to take responsibility for. We believe that obtaining consent prior to ICP creation will add unnecessary delays and workload to all parties with little benefit.		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above.			