

Compliance plan for WEL Networks Distributor – 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) & 10.6(1) From: 01-Jan-21 To: 30-Jun-22	Registry information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur. The audit risk rating is low as the incorrect information has a small or no direct effect on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>WEL notes that that the number of registry updates and actions completed is great in number (eg 10,366 address updates and 24,238 pricing updates), but the number of variances or perceived inaccuracies is extremely low and has minimal impact.</p> <p>WEL reviews discrepancies on a daily basis but are reliant often on other parties such as retailers and living agents in giving us correct information in a timely manner. We have evidence where we have pushed parties for information or to recheck information provided.</p> <p>Through the audit it's noted that we have updated information as soon as we have been given it, or corrected information once being made aware of any incorrect information.</p> <p>It is also noted in the audit that some registry information could not be correctly inputted by WEL Networks due to the actions of other parties. The best example of this is the inability for the registry to accept us entering in the correct decommission date where either the Trader or MEP has an event that is dated later. This is a flaw of the Electricity Registry itself, however the black and white nature of this audit penalizes the distributor.</p>	September 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>WEL will continue to work with necessary parties to remind them of their obligations to provide information required for registry updates in a timely manner.</p> <p>Any recommendations provided in the audit will be taken onboard in the manner that they were intended and implemented where practical and meaningful.</p> <p>We note that Veritek deem the controls in place to be "moderate" as they allow room for errors. We question exactly what "strong" controls would look like.</p>	September 2021	
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Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5 With: 7(2A) of Schedule 11.1</p> <p>From: 01-Jan-21 To: 30-Jun-22</p>	<p>Four ICPs out of a sample of ten ICPs had the initial electrical connection dates updated greater than ten days from the event date.</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>The audit risk rating is moderate as WELs has good controls in place to monitor outstanding IECD records; however, using a traders active status event as the source of IECD values is not consistent with the need to independently verify the actual network connection date.</p> <p>The audit risk rating is low this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Livening agents strongly reminded of their obligations to provide timely livening details and since audit date this has been occurring regularly.</p> <p>This is another area where we would be keen to know what would constitute 'strong' controls. We cannot think of any further "controls" which would alleviate this issue.</p>	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>If we do not get the information requested, we will continue to use the retailer date as the IECD to ensure field is populated. Note that this is also reliant on the retailer updating the ICP status to active in a timely manner to alert us to an update being required. Once the livening agent has supplied details, this inputted date is confirmed, and any discrepancies are followed up.</p> <p>This is no change to what we are currently doing. No distributor is going to be able to prevent these kinds of issues from occurring due to actions or inactions or 3rd parties.</p>	September 2022	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: clause 8 schedule 11.1</p> <p>From: 01-Sep-19</p> <p>To: 31-Dec-20</p>	<p>A small number of registry event updates backdated greater than three days.</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 as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as the volume of ICPs affected are small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>In the Distributed Generation area, WEL has now taken steps to improve our registry updates.</p> <p>Firstly we are now chasing up paperwork completion details once the proposed installation date has passed as opposed to the 90 day validity period previously. This is as per recommendation.</p> <p>In the information that comes through to WEL Registry for updating, we are now clearly including the commissioned date. That is the date that is now being updated in the registry. These two things will help improve timeliness and accuracy of registry updates, though we still need to note that the distributor is still reliant on paperwork being returned in a timely manner. We rely on them advising us in a timely manner, but there are no consequences for them if they do not do this.</p> <p>While we have an option to physically disconnect a property, this is not a desirable outcome for any party and would open us up for Health and Safety issues.</p>	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Distributed Generation recommendation was put in place right away and is seeing some benefits.</p> <p>In all the other areas identified with perceived late updates, WEL feels it is almost impossible to get all updates done as soon as they occur and to be 100% accurate. There is no difference between smaller and larger networks in terms of the amount of updates being done. The rigidity of this audit means one late update and you are marked down, regardless of the reasons. WEL has provided good feedback in this area and others following our previous audit and did not receive any acknowledgement from the EA on our concerns.</p> <p>So while we fully accept that there were late updates, WEL points to the number of updates done, the fact that some must be done later (eg Nominated Capacity changes for TOU sites must occur from 1st of month as cannot be changed mid-month) and examples of us not physically being able to do what is required. We point to the specific audit comment below in regard to decommission dates:</p> <p>I have recorded non-compliance for these updates in section 2.1 as these dates don't represent the date of the decommissioning event even though the MEP event is technically blocking WEL Networks ability to correctly apply their status event.</p>	September 2022	
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Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 01-Sep-19 To: 31-Dec-20	Seven ICPs with incorrect NSP assignment. 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 recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor as the affected NSPs are within the same balancing area; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Incorrect information that is populated into our GIS mapping system may flow through to the registry. Since the last audit we added pole numbers for ICPs to lessen the chance of incorrect NSP allocations occurring, but we cannot cater for all potential avenues of errors occurring. We take every care to prevent this	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Any errors are be corrected as soon as we are made aware of them	September 2022	

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Jan-21</p> <p>To: 30-Jun-22</p>	<p>Distributed generation details missing.</p> <p>Distributed generation event dates not reflective of connection date.</p> <p>Two ICPs with an incorrect initial electrical connection date populated.</p> <p>Two ICPs with unmetered load discrepancies.</p> <p>Two ICPs with incorrect loss codes.</p> <p>14 unmetered pay phones with incorrect hours of operation recorded with an annual load impact of 710 kWh of under submission if the distributor's load description was applied.</p> <p>Unmetered load (Shared or Standard) ICPs not created to record the load for 40 private lights resulting in an estimated under submission of 17,193 kWh per annum.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is medium due to the volume impact to the settlement process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Recommendations taken on board and work has recommenced on unmetered private streetlighting area to determine who is responsible and appropriately bill.</p>	<p>September 2022</p>	<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Once cleared we will look at current processes to ensure they are fit for purpose, though as we are strongly opposed to any new unmetered load, we feel we will not consciously add to the current issue.</p>	<p>Ongoing</p>	

Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 20 Schedule 11.1</p> <p>From: 01-Jan-21</p> <p>To: 30-Jun-22</p>	<p>Decommission event dates incorrect for four ICPs (0076162158WE6E3, 0000473641WEBA7, 0000690634WE4F0 and 0079162425WE516).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as the errors found have no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will continue our current processes and checks as they are robust.	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We will continue our current processes and checks as they are robust.</p> <p>As noted, and marked in previous sections of this audit, unless the EA Registry has changes made to it, we will continue to have incorrect dates inputted into the registry through no fault of our own.</p> <p>As noted, dates incorrectly recorded for four ICPs were due to MEP events blocking WEL Networks ability to apply the correct event dates. The rigidity of this audit means we get breach risk rating points for issues which are outside of our control.</p>	September 2022	

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: 18-Jun-21 To: 24-Nov-21	Certification for NSP KIR0111 not notified to RM within 20 business days of recertification. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate for the updating of GXPs meter recertifications. The audit risk rating is low as the meters were certified at all times and there was no impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
WEL will continue to take care to ensure timely updating where we can.	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
WEL will continue to take care to ensure timely updating where we can.	September 2022	

Notification of shared unmetered load ICP list		
Non-compliance	Description	
Audit Ref: 7.1 With: 11.14(2) and (4) From: 01-Jan-21 To: 30-Jun-22	Written notice not provided to affected parties for 40 private lights identified. Potential impact: Medium Actual impact: Medium Audit history: Multiple Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as moderate for the management of unmetered load but these lights need to be resolved. The audit risk rating is medium as the volume of non submitted energy due to the non-creation of shared UML ICPs is assessed at 17,193 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
Recommendations noted and comments made in previous audit sections.	September 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Recommendations noted and comments made in previous audit sections.	September 2022	