

## Compliance Plan Wellington Electricity Distributor – 2021

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-Oct-20 To: 25-Nov-21	A small number of discrepancies and some corrections from the last audit still to be corrected.  Shared unmetered load has not been created to account for the shared unmetered load on the network.  One ICP with a mis-mapped NSP.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as there has been an improvement in registry accuracy with the introduction of additional processes to identify discrepancies.  The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>Shared Unmetered Load:</b> Work with Gentrack to resolve shared unmetered load functionality. <b>NSP Assignment:</b> One outstanding ICP to be remedied	01/12/2022  31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>NSP Dedication:</b> Parameter to be added in the daily health check process	31/03/2022	

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With Clause 11.2(2)  From: 01-Nov-18 To: 25-Nov-21	Correction of some data not carried out as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Three 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 the non-compliance remains as shared unmetered load has not been resolved for a number of years.  The risk is rated as low, as the impact of the shared unmetered load not being reconciled is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue to work through resolving historical data errors. Expected to clear the majority of errors in the next calendar year.	01/12/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>Shared Unmetered Load:</b> Work with Gentrack to resolve shared unmetered load functionality. If shared unmetered load functionality is delivered earlier than the target completion date, we will pilot the application of shared unmetered load to a small number of ICPs.	01/12/2022  01/12/2022	

<b>Distributors must create ICPs</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.1 With: Clause 11.4  From: 31-Dec-17 To: 25-Nov-21	Shared unmetered load ICPs not created to account for shared unmetered streetlights connected on the network.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Moderate  Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I rate the controls as moderate due to the lack of process to create shared unmetered load ICPs.  The risk is rated as low, as the impact of the shared unmetered load not being reconciled is minor.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<b>Shared Unmetered Load:</b> Work with Gentrack to resolve shared unmetered load functionality. If shared unmetered load functionality is delivered earlier than the target completion date, we will pilot the application of shared unmetered load to a small number of ICPs.	01/12/2022  01/12/2022	

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3)  From: 09-Jul-21 To: 15-Jul-21	Two ICPs not created within three business days and notification not provided to the participant.  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>	The controls are rated as strong; these two notifications appear to be one-off issues.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
<b>Requests for ICP creation:</b> Investigation of a system to tag and highlight requests for new ICPs, which are about to exceed the required timeframe for creation.		30/06/2022
<b>Requests for ICP creation:</b> Amend process to ensure notification to retailer is consistently performed if delay of creation is possible.		31/01/2022
		Identified

<b>Timeliness of Provision of Initial Electrical Connection Date</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Oct-20 To: 27-Sep-21	112 late initial electrical connection updates. Potential impact: Low Actual impact: Low Audit history: Multiple times 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. Improvements were made during the audit period with the addition of the use of the AC020 report. The impact is assessed to be low as the majority of dates are populated in the required timeframe.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<b>Late population of IEDs:</b> Continue to work through resolving historical data errors. Expected to clear the majority of errors in the next calendar year.	01/12/2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<b>Livening Paperwork:</b> Enter dialogue with MEPs to identify possible options for providing livening information to WE	31/05/2022	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 01-Oct-20 To: 27-Sep-21	2,641 late pricing updates. 129 late status updates. 3 late network updates. 95 late distributed generation updates.  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 rated as moderate as they will mitigate risk most of the time.  The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
<b>Late status changes:</b> Change decommission process to improve the timeliness of status updates.		30/06/2022
		Identified

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-Oct-20 To: 27-Sep-21	13 ICPs with the incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as Wellington Electricity processes demonstrated robust controls. The risk rating is low as Wellington Electricity has one balancing area and therefore an incorrect NSP has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>NSP Assignment:</b> One outstanding ICP to be remedied	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clauses 2 Schedule 11.1 From: 01-Oct-20 To: 27-Sep-21	20 active ICPs without a readily locatable address. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as Wellington Electricity processes demonstrated robust controls. The audit risk is assessed to be low as only 20 active ICPs have addresses not readily locatable.	
Actions taken to resolve the issue		Completion date
<b>ICP Location Address:</b> Work ongoing to resolve majority of remaining issues.		30/06/2022
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified



Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1  From: 01-Oct-20 To: 27-Sep-21	1 LE ICP with the NSP dedication set to No. 1 ICP with the NSP dedication set to Yes. 2 ICPs with distributed generation present and the incorrect installation type of "L". 8 incorrect initial electrical connection dates recorded. 7 ICPs with the incorrect unmetered load details recorded. Shared metered load present but not recorded on the registry. 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 rated as strong as there has been an improvement in registry accuracy with the introduction of additional processes to identify discrepancies. The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>NSP:</b> Parameter to be added in the daily health check process. <b>Unmetered Load Details Format:</b> Continue to work with Gentrack to fix how Unmetered details are reported to Registry. <b>Unmetered Load Discrepancies:</b> Continue to work with Retailers to resolve.	31/03/2022 01/12/22 30/06/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>Shared Unmetered Load:</b> Work with Gentrack to resolve shared unmetered load functionality. If shared unmetered load functionality is delivered earlier than the target completion date, we will pilot the application of shared unmetered load to a small number of ICPs.	01/12/2022 01/12/2022	