

Compliance plan for Westpower Distributor– 2020

Complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Aug-18 To: 31-Jul-20	Incorrect initial electrical connection dates populated for 36 ICPs. 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 because overall they mitigate risk to an acceptable level. There is no impact to the market therefore I have rated the audit risk rating as low.	
Actions taken to resolve the issue		Completion date
We will liaise with both Traders and MEPs to resolve this issue.		Jan 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Implement an alert process from the Trader/MEP.		Jan 2021
		Identified

Ready updates		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 05-Feb-19</p> <p>To: 19-May-19</p>	<p>Two ICPs updated to “ready” after electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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
This was raised as a non-compliance with the QA department for our Service Provider at the time. To our knowledge, there have been no further occurrences		2 October 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Our new connection process has a step to ensure a trader accepts responsibility and is recorded in the Registry.		2 October 2020
		Identified

Provision of the initial electrical connection date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 05-Oct-18</p> <p>To: 10-Jul-20</p>	<p>Ten late updates of the initial electrical connection date.</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 recorded as strong because they mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
We are working with the Service Provider to reinforce the importance of timely filing of paperwork.		31/12/2020
Preventative actions taken to ensure no further issues will occur		Completion date
A role will be established by the Service Provider to manage the compliance of staff doing this work including meeting regulatory timeframes around livening notifications. This will include appropriate training.		31/12/2020
		Identified

Connection of an ICP that not an NSP			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 05-Feb-19</p> <p>To: 19-May-19</p>	<p>Two ICPs electrically connected prior to a trader being recorded as having accepted responsibility.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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
This was raised as a non-compliance with the QA department for our Service Provider at the time. To our knowledge, there have been no further occurrences		2/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our new connection process has a step to ensure a trader accepts responsibility and is recorded in the Registry.		2/10/2020	

Connection of an ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 10.31</p> <p>From: 05-Feb-19</p> <p>To: 19-May-19</p>	<p>Two ICPs connected without agreement from the trader.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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
This was raised as a non-compliance with the QA department for our Service Provider at the time. To our knowledge, there have been no further occurrences		2/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Our new connection process has a step to ensure a trader accepts responsibility and is recorded in the Registry.		2/10/2020
		Identified

Registry updates		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Aug-18</p> <p>To: 31-Jul-20</p>	<p>Updates to registry backdated greater than 3 business days of the event.</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. Overall Westpower has robust controls but the distributed generation process requires review to improve the timeliness of these updates.</p> <p>The audit risk rating is low as the volume of backdated events is small.</p>	
Actions taken to resolve the issue		Completion date
An audit is being undertaken of all approved DG connections to ensure that our data is accurate.		31/12/20
Preventative actions taken to ensure no further issues will occur		Completion date
We will update our CIWR process to include a DG workflow and treat these like other new connections, ensuring that all of the data entry is carried out in an accurate and timely fashion. If necessary, we can include penalties on non-compliant installers.		31/12/20
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 01-Aug-18 To: 31-Jul-20	187 ICPs with insufficient details to be 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 rated as robust as they will mitigate risk most of the time. The audit risk rating is low as this has no direct impact on reconciliation but could affect meter readers ability to get manual reads.	
Actions taken to resolve the issue		Completion date
We have an on-going project to update addresses.		30/09/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Accurate addresses with identifiers are uploaded for all new ICPs.		30/09/2021
		Identified

Registry accuracy		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Aug-18 To: 31-Jul-20</p>	<p>36 incorrect initial electrical connection dates.</p> <p>1 ICP with distributed generation details missing.</p> <p>1 ICP with incorrect unmetered load details.</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	
Low	<p>The controls are rated as moderate. Overall Westpower has robust controls but the distributed generation process requires review and the accuracy of the initial electrical connection dates needs investigation.</p> <p>The audit risk rating is assessed to be low as the volume of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date
Westpower will liaise with MEPs and Traders to resolve these issues. Site visits will be carried out as required.		31/12/20
Preventative actions taken to ensure no further issues will occur		Completion date
We will continue to reinforce the need to comply with our workflow and processes as per the CIWR standard.		31/12/20

Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 20 Schedule 11.1</p> <p>From: 01-Aug-18</p> <p>To: 31-Jul-20</p>	<p>Two ICPs decommissioned in Gentrack but at the incorrect status in the registry.</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	
Low	<p>Controls are rated as moderate. The process in place ensures that the majority of ICPs are managed correctly.</p> <p>The audit risk rating is low as there were only two ICPs at the incorrect status.</p>	
Actions taken to resolve the issue		Completion date
A new decommissioning process has been put in place. Site visits will be carried out to resolve and update historical information.		31/12/20
Preventative actions taken to ensure no further issues will occur		Completion date
We will reinforce the need for the Service Provider to comply with the new process and timeframes and we will monitor their performance.		31/12/20
		Identified