

## Compliance plan for The Lines Company (Jan 2020)

Title: Participants to give access		
Non-compliance	Description	
<p>Audit Ref: 1.12</p> <p>With: Clause 16A.4</p> <p>From: 07-Oct-19</p> <p>To: 18-Nov-19</p>	<p>Late provision of audit information.</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	
<b>Low</b>	<p>Controls are rated as moderate, the delays were primarily caused by staffing changes. This was the first audit for the staff who provided the audit information. The impact is assessed to be low.</p>	
Actions taken to resolve the issue		Completion date
TLC has proposed extension of the audit deadline and the authority approved that request. The new dates were informed to the auditor.		11/12/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>TLC has identified the key gaps that have contributed in late provisioning of the audit information. In order to prevent such occurrence TLC has proposed the following actions to be implemented before the next audit:</p> <ol style="list-style-type: none"> <li>1. Apply delegation strategies by forming a team rather than making one person to collect all the information.</li> <li>2. Track key deliverables against deadlines.</li> <li>3. Be prepared for the uncertainties such as leaves, resignations etc.</li> </ol>		29 <sup>th</sup> May 2020
		Identified

Title: Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11.2(1)</p> <p>From: Jan-19 To: Jan-20</p>	<p>The registry validation does not identify ICPs which may have distributed generation where TLC has not received an application.</p> <p>One network update (0001113048WM297) and three status updates to decommissioned (0007301240WM664, 0004040132WMDF5, and 0048060010WMDFD) had incorrect event dates applied.</p> <p>Three discrepancies identified in the previous audit (0001112461WMC32, 0001112847WMCE4, 0003330318WM71B and all ICPs with dedicated NSP set to “yes”) have not been corrected.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as strong overall. Automation is in place for registry updates and acknowledgements, although data must be manually selected for update and exceptions are manually worked through. The discrepancy reporting process will detect and correct any instances where registry updates have not been triggered or have failed.</p> <p>The audit risk is rated as low as the inaccurate information does not have a direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Change to correct dates and NO for NSP		29/05/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Contact Trader to ask if there is any issue with changing NSP setting to NO		29/05/2020
Remedial action status		
Identified		

Title: Distributors must create ICPs	
Non-compliance	Description
<p>Audit Ref: 3.1 With: Clause 11.4</p> <p>From: unknown To: 14-Jan-19</p>	<p>ICPs are not created for ten streetlights.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as strong as TLC have a robust ICP creation process and these lights are an historic issue and no other such instances have been identified.</p> <p>I have rated the audit risk rating as low as the kWh volume associated with these lights will be small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Investigating. Found a 2006 decommissioned ICP for streetlights in Gentrack. 0008210850WM718 (Note had “unused ICP”)		29/05/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Once investigation is completed we'll know how to prevent this occurring again		29/05/2020	

Title: Timeliness of Provision of 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: 04-Feb-19</p> <p>To: 20-Sep-19</p>	<p>Late population of the initial electrical connection dates for 61 ICPs.</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>I have rated the controls as moderate, in most cases the updates were delayed while TLC obtained confirmation of the correct date.</p> <p>Most initial electrical connection dates were populated on time. The impact on participants is minor because this field is used to validate other fields against.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Correct remaining dates		29/05/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training and review the new connection processes.		29/05/2020	

Title: Connection of NSP that is not point of connection to grid			
Non-compliance	Description		
Audit Ref: 3.9 With: Clause 10.30  From: 01-Jul-19 To: 18-Jul-19	Metering certification details for TLC0111LINENP were provided more than five business days after electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are moderate, because there is room for improvement. TLC requires FCLM to provide metering certification details to the reconciliation manager. The impact is low. The metering certification details were provided 13 business days after initial electrical connection.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Improve FCLM/TLC communication. FCLM Staff training to ensure delivery of paper work in a timely fashion. TLC can recommend FCLM to bring changes in their reporting process.		31/03/2020	

Title: Management of “new” status			
Non-compliance	Description		
Audit Ref: 3.13 With: Clause 13 of Schedule 11.1  From: 18-Dec-18 To: 12-Aug-19	Eight ICPs temporarily had “new” status applied in error. All were corrected to “ready” and then “active” status prior to the initial electrical connection date. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate. No exceptions have occurred since August 2019, and all the exceptions were identified and resolved through TLC’s discrepancy management processes. The impact is assessed to be low, all of the ICPs were made “ready” before they were initially electrically connected.		

Actions taken to resolve the issue	Completion date	Remedial action status
		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Training staffs and review the internal processes.	29/05/2020	

Title: Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 of Schedule 11.1</p> <p>From: 17-Dec-18</p> <p>To: 04-Dec-19</p>	<p>34 late address updates.</p> <p>Ten late network updates to distributed generation details.</p> <p>149 late network updates to fields other than distributed generation details.</p> <p>45 late updates to decommissioned status.</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	
<b>Low</b>	<p>The controls are rated as moderate. Most of the late updates were corrections or were delayed while TLC confirmed that the updates were required. Some updates were delayed because not all steps to complete the registry update were completed in Orion and the missed update was identified through the registry discrepancy reporting process.</p> <p>There may be a minor impact on other participants. Processing corrections improves compliance with the completeness and accuracy requirements.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training staffs and review the internal processes.	29/05/2020	

Title: Notice of NSP for each ICP			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clauses 7(1),(4) and (5) Schedule 11.1</p> <p>From: 01-Sep-13</p> <p>To: 14-Jan-20</p>	<p>0003330318WM71B is connected to ONG0331 but recorded as connected to TKU0331.</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		
<b>Low</b>	<p>Controls are rated as moderate, because the correction has not been processed yet.</p> <p>There is no impact on reconciliation because both NSPs are in the same balancing area.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
After investigation we have resolved the issue. The registry has been updated.		03/02/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TLC to be more vigilant. Ongoing process.			

Title: ICP location address			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 13-Nov-19</p> <p>To: 14-Jan-19</p>	<p>110 ICPs have incomplete or duplicate address information; nine of the affected ICPs had their addresses corrected during the audit.</p> <p>Ten ICPs had incorrect address regions recorded and were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as strong as ICPs created during the audit period have addresses that are readily locatable and unique. TLC intends to undertake reviews and site visits to determine the correct addresses.</p> <p>The audit risk rating is low based on the volume of ICPs affected, and that TLC is working to resolve the issues.</p>		



Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as moderate overall. Some exceptions been present since the previous audit, but TLC intends to resolve them. Apart from the NSP flag exceptions, there were generally small numbers of discrepancies and most were identified and corrected through TLC's discrepancy reporting processes prior to the audit.</p> <p>The audit risk rating is low because:</p> <ol style="list-style-type: none"> <li>1) The ICPs affected by the incorrect dedicated NSP flag are believed to have the correct NSP assigned and be within the correct balancing area, minimising any impact on reconciliation.</li> <li>2) The initial electrical connection date field does not have a direct impact on reconciliation. The impact on participants is minor because this field is used to validate other fields against.</li> <li>3) For ICP 0001062900WM45A the trader had already recorded generation details and installed generation metering, minimising any impact on reconciliation. The installation had been inspected.</li> <li>4) For ICP 0001112718WM43D the trader had already recorded unmetered load information, minimising any impact on reconciliation.</li> </ol>		
Actions taken to resolve the issue		Completion date	Remedial action status
TLC agrees with the auditor			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing refinement of the processes			

Title: GPS coordinates	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 7(8) and (9) Schedule 11.1</p> <p>From: 25-Jun-19</p> <p>To: 05-Aug-19</p>	<p>11 ICPs had GPS coordinates populated in the WGS84 format instead of NZTM2000 format.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as weak, because no GPS coordinates were populated in the correct format.</p> <p>The potential impact is low, because other address information will assist in the location of the ICP and the coordinates have been removed.</p>



Actions taken to resolve the issue	Completion date	Remedial action status
WGS84 has been converted to NZTM. Orion fields need updating to accept this format	29/05/2020	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We are now aware of the correct formatting and use conversion table if required.	29/05/2020	

Title: Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: 10.25(1) and 10.25(3)</p> <p>From: 17-Oct-19</p> <p>To: 14-Jan-20</p>	<p>Meter certification details for WKM0331 were not provided to the reconciliation manager within 20 business days of recertification.</p> <p>Certification for WKM0331 is expired on the NSP table.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are moderate, because there is room for improvement. TLC requires FCLM to provide metering certification details to the reconciliation manager.</p> <p>The impact is low, because the meter was certified at all times.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
TLC recommends that the MEP to be responsible for recertification.	27/02/2020	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
TLC recommends that the MEP to be responsible for recertification.	27/02/2020	