

Compliance Plan 2020

Northpower Ltd

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 7(2A) of Schedule 11.1 From: 21-Feb-19 To: 20-Feb-20	Relatively low number of information inaccuracies identified during the audit 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 during the audit evidence was produced showing considerable steps taken to achieve accuracy, exception reporting in place and correction of any errors discovered. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer comments in the 7 individual sections where non-compliances were reported by the auditor (3.5, 3.6, 3.7, 4.1, 4.4, 4.6, and 4.9)		31/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer comments in the 7 individual sections where non-compliances were reported by the auditor (3.5, 3.6, 3.7, 4.1, 4.4, 4.6, and 4.9).		31/10/2020	

Non-compliance	Description		
<p>Audit Ref: 3.5 With:</p> <p>Clause 7(2A) of Schedule 11.1</p> <p>From: 21-Feb-19 To: 20-Feb-20</p>	<p>8 New ICP connections had the IECD uploaded to the registry more than 10 days after the event date. 1 ICP had no IECD populated in the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because Northpower has well documented processes, information recording and exception reporting. The main issue appears to be the bedding in of a new process following a change to the new connection process. No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Network Approved Contractors operate on the network under an agreement ("NACA") which requires them to provide information within certain timeframes, to ensure that Northpower can comply with its Code obligations.</p> <p>Northpower will raise the instances identified by the Audit with the Network Approved Contractors concerned as potential breaches of their NACA, and work with them to ensure they comply with the NACA going forward.</p>		30/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Northpower will remind all Network Approved Contractors of the timeframe requirements under their NACA agreements, and provide context that this is necessary to ensure that Northpower can comply with its Code obligations.</p> <p>Northpower will continue to reconcile its data against the Registry supplied NMR files to identify missing information for us to update the Network and Pricing events, where the information is not provided to us directly by the trader or contractor.</p>		30/10/2020	

Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With:</p> <p>Clause 11.17</p> <p>From: 21-Feb-19</p> <p>To: 20-Feb-20</p>	<p>10% of New ICP connections sampled had no retailer acceptance of responsibility recorded by Northpower.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because Northpower has well documented processes, information recording and exception reporting. The issue appears to be the bedding in of a new process following change to the new connection process. No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will approach all retailers on the network for a blanket retailer acceptance and approval to live.</p> <p>Where an ICP has nominated a retailer for whom we do not have a blanket acceptance and approval, the Customer Service team will request the retailer's acceptance of the connection via email. The connection will not be moved to "Ready" in the registry until this is received.</p>		30/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above		30/10/2020	

Non-compliance	Description		
<p>Audit Ref: 3.7 With:</p> <p>Clause 10.31</p> <p>From: 21-Feb-19 To: 20-Feb-20</p>	<p>For a number of ICPs there is no retailer authorisation or request to connect recorded by Northpower.</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 recorded as moderate because Northpower has well documented processes, information recording and exception reporting. The issue appears to be the bedding in of a new process following change to the new connection process. No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will approach all retailers on the network for a blanket retailer acceptance and approval to liven.</p> <p>Where an ICP has nominated a retailer for whom we do not have a blanket acceptance and approval, the Customer Service team will request the retailer's approval to liven. Northpower will not provide the retailer with approval to connect until the approval to liven is received from the retailer.</p>		30/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above		30/10/2020	

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 21-Feb-19 To: 20-Feb-20	19% of registry information updates were greater than 3 business days from the event date. 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 exception reporting and follow up is evident. Unfortunately efforts made to correct and maintain registry information can result in updates over 3 days and consequent non-compliance. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>Most of the Network and Pricing events that are updated to the Registry beyond the Code required 3 business days are due to late or no notification by the traders or their contractors.</p> <p>Where Northpower receives no notification of ICP changes, including the installation of generation, from the trader or the trader's contractor, our only option is to use the NMR files provided by the Registry as the source data for changes to the Network and Pricing events.</p> <p>Northpower enters the data backdated to the correct date (even at the risk of breach) to ensure the Registry is populated with correct information, rather than enter it as at the date it is provided to us.</p> <p>In addition:</p> <ol style="list-style-type: none"> 1. Northpower will correct any data errors discovered in the Registry and this often requires existing historical Registry entries to be replaced. 2. Decommissioning of ICPs cannot be completed in the Registry until any subsequent Registry events are removed by any or all of Northpower, the trader, and the MEP. The trader also must move the Registry status to Inactive Ready for Decommissioning. Unfortunately, this process can take some weeks and several emails before these Registry changes are made by a trader or MEP. <p>Whilst not all ICP changes require a Network Approved Contractor, Northpower will remind all Network Approved Contractors of the timeframe requirements under their NACA agreements, and provide context that this is necessary to ensure that Northpower can comply with its Code obligations.</p>	<p>Not applicable</p> <p>30/10/2020</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p>Wherever possible Northpower is endeavouring to update the Registry within the timeframe required by the Code, however as contractors are now usually contracted by the trader, they do not always provide the information to Northpower in a timely manner to enable Code updates within the required timeframe.</p> <p>Whilst not all ICP changes require a Network Approved Contractor, Northpower will remind all Network Approved Contractors of the timeframe requirements under their NACA agreements, and provide context that this is necessary to ensure that Northpower can comply with its Code obligations.</p> <p>A note that Gentrack will often send an older backdated entry to the Registry, usually related to the Part 10 go-live period, when data for an ICP is changed that affects the Registry. We have introduced daily checks to capture, then reverse, these old entries. Unfortunately this will mean both the initial update and the reversal are effectively backdated beyond 3 working days.</p>	<p>Not applicable</p> <p>30/10/2020</p> <p>Not applicable</p>	
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Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 21-Feb-19 To: 20-Feb-20	2 ICPs with duplicate addresses (corrected during audit). 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 during the audit evidence was produced showing considerable steps taken to achieve accuracy, exception reporting in place and correction of any errors discovered. Minor impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICP's without mail service (sheds and pumps) and some urban installations such as multi tenanted buildings do not have meaningful unique address information that can be accommodated in the prescribed fields in the Registry. Wherever possible we are endeavouring to make sure that the physical location address is both unique and descriptive of the ICP's physical location. When identified the two ICPs raised by the auditor (an urban building split into multi tenancies) were researched and changes made to the address data so that both ICPs had unique address data.		Not applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
During our physical location address update process we continually look for ICPs with insufficient or duplicate address data so these can be investigated and corrected where possible. The new Audit Compliance spreadsheet available from the Registry will help with this process by providing an additional method for identifying these ICPs.		Not applicable	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With:</p> <p>7(1)(m)(o)(p) of Schedule 11.1</p> <p>From: 21-Feb-19</p> <p>To: 20-Feb-20</p>	<p>Incorrect or missing information in the registry for ICP addresses, distributed generation and Initial Electrical Connection 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 controls are recorded as moderate because during the audit evidence was produced showing exception reporting in place and correction of any errors discovered. Minor impact on settlement outcomes. Audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The two cases identified in the Audit Compliance Summary Report during the audit were investigated:-</p> <ol style="list-style-type: none"> 1. ICP 0000543226NR229 was not recorded in Gentrack as having generation as Northpower has never been advised that generation has been installed at this ICP. An application for distributed generation had been received by Northpower but no further information had been received at the date of the audit. We will schedule a site visit to confirm whether there is generation installed at this ICP. 2. The missing Initial Energisation Date had been updated in Gentrack however the update to the Registry was rejected with an error code in the Acknowledgement file. Unfortunately this error code entry was missed during the daily investigation and clearance of the Acknowledgement file errors. As noted in the audit report commentary this missing date was updated when discovered during the audit. 		30/06/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A regular review of the Audit Compliance Summary Report will be added to our existing Registry reconciliation and discrepancy reporting processes to help identify cases where information is either missing or does not match between the Registry and Northpower's records.</p> <p>We will continue to use the NMR (Metering Notification) files returned by the Registry to identify events not advised to us by traders on the network.</p>		31/10/2020	

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With:</p> <p>Clause 14 of Schedule 11.1</p> <p>From: 21-Feb-19</p> <p>To: 20-Feb-20</p>	<p>For a significant number of ICPs registry status was made “Ready” prior to retailer acceptance/confirmation of responsibility being received by Northpower.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as moderate because Northpower has good processes, information recording and exception reporting, the issue is just timing. No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will approach all retailers on the network for a blanket retailer acceptance and approval to liven.</p> <p>Where an ICP has nominated a retailer for whom we do not have a blanket acceptance and approval, the Customer Service team will request the retailer’s acceptance of the connection via email. The connection will not be moved to “Ready” in the registry until this is received.</p>		31/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above		31/10/2020	