

Compliance Plan for NEW ZEALAND AIRWAYS LTD (NZAL)

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3) From: 04-Oct-19 To: 08-Oct-19	One ICP created late. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, as they are sufficient to ensure ICPs are created on time most of the time. The risk is low as only ICP was affected, and the ICP was created immediately when a reminder was received.	
Actions taken to resolve the issue		Completion date
The ICP was created immediately on reminder from trader SIMP		8/10/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Updated New ICP process: give reason to trader if unable to create ICP within 3 BD of receiving request; add compliance check to schedule check and further action in 3 BD. User training.		20/4/2020
		Cleared

Connection of NSP that is not point of connection to grid		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 10.30 From: 08-Jan-20 To: 05-Mar-20	The Reconciliation Manager was advised after 23 business days for NBS0011. 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 rated as strong, as they are sufficient to ensure updates are on time most of the time. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Meter certification details have been entered and advised to the Reconciliation manager		Various
Preventative actions taken to ensure no further issues will occur		Completion date
Monitoring of certificate request dates using workflows and system Dashboard. Monitoring MEP certificate delivery timeliness.		On going
		Identified

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Mar-18 To: 05-Mar-20	One late Network event. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. The risk is low as a there was only one late event.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was User error. There was no impact on the market as the ICP was never Active		21/4/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
User training		21/4/2020	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Mar-18 To: 05-Mar-20	The list file showed two duplicate addresses. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, as they are sufficient to ensure addresses are unique most of the time. The duplicate addresses were entered at the retailer's request. The risk is low as a small number of ICPs are affected, and the registry has been updated.	
Actions taken to resolve the issue		Completion date
One address updated in Registry and now both unique.		21/4/2020
Preventative actions taken to ensure no further issues will occur		Completion date
To prevent recurrence of duplicate addresses TENCO intends to use regular SQL queries to verify addresses are unique		In progress
		Identified

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: Clause 10.25(1) and 10.25(3)</p> <p>From: 08-Jan-20</p> <p>To: 05-Mar-20</p>	<p>The meter installation certification expiry date advised late for NSPs NPS0011 and NWH0011.</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 rated as strong, as they are sufficient to ensure updates are on time most of the time.</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
Recertification details have been entered and advised to the Reconciliation manager		Various
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Ongoing monitoring of recertifications required by MEP through dashboards and a weekly check with an escalation mechanism to expedite receipt if required.</p> <p>Also code change request to Authority as noted above</p>		On going
		Identified

Responsibility for metering information when creating an NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 10.25(2) From: 08-Jan-20 To: 05-Mar-20	The meter installation certification expiry date advised after 31 days for NSP NBS0011. 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 rated as strong, as they are sufficient to ensure updates are on time most of the time. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Meter certification details have been entered and advised to the Reconciliation manager		Various
Preventative actions taken to ensure no further issues will occur		Completion date
Monitoring of certificate request dates using workflows and system Dashboard. Monitoring MEP certificate delivery timeliness.		On going
		Identified