Compliance plan for Electricity Invercargill - 2019

Non-compliance	Description
Audit Ref: 2.1 With: 11.2(1) From: 01-Aug-18 To: 15-Aug-19	The Effective Date for changing an ICPs status to "decommissioned" is incorrect. Incomplete information for a small number of ICPs. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are recorded as moderate because some refinement could still be made. PowerNet runs a few reports which monitor the integrity and validity of information in the registry. Audit risk rating is assigned as low because the impact on the settlement outcome is minimal.

Actions taken to resolve the issue	Completion date	Remedial action status
Decommission Date – During last year's audit we learned we had been treating this date incorrectly. We immediately change our processing to loading the correct Event Date. However, is has now been discovered our data tool was ignoring the Event Date. This is being rectified. An error in our data processing tool resulted in a number of ICPs not populating to the registry the Initial Electrical Connection Date, even though the information was received, and operators took required action with it. The error has been rectified and the missing data loaded.	30/09/19	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Corrections of data processing tool as mentioned above.	30/09/19	

Non-compliance	Description
Audit Ref:.3.5 With: 7(2A) of Schedule 11.1 From: 01-Aug-18 To: 15-Aug-19	Late of Initial Electrical Connection Date for 1 ICP 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	The controls are rated as moderate because there are some improvements that can be made to them. The number of late updates is the same as identified last year. Audit risk rating assigned as low because the impact on settlement outcomes is low

Actions taken to resolve the issue	Completion date	Remedial action status
Reporting of ICPs to identify anywhere Initial Electrically Connected Date has not been recorded is being reviewed to create improvements. This includes the regularity of running the report, which it appears has fallen away over the year, due to some changes of staff/roles.	30/09/19	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
ICPs identified with no IEC Date are investigated with the connecting agent to ensure future compliance with policy and timely forwarding of information from the field.	Ongoing	

Non-compliance	Description
Audit Ref: 3.14 With: 15 of Schedule 11.1 From: 01-Aug-18 To: 15-Aug-19	The process of asking the trader who intends to trade at the ICP whether the ICP should continue to have that status was not followed. Number of ICPs with the status “new” and “ready” increased Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are recorded as moderate because the process of checking with traders has not been followed. Audit risk rating is recorded as low because a small number of ICPs is affected.

Actions taken to resolve the issue	Completion date	Remedial action status
In previous years a purge has been carried out which removed a backlog of aged ICPs.	Historic	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Review procedures to ensure this review aged ICPs is carried out regularly	30/11/19	

Non-compliance	Description
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Aug-18 To: 15-Aug-19	Registry information not updated within 3 business days 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. Compliance in this is improved due to stricter processes. Our audit risk rating is low because backdating of price codes has no financial impact, most of them occur within the same billing month. There is no impact on settlement outcomes.

Actions taken to resolve the issue	Completion date	Remedial action status
Some updates have been outside of required timeframes due to correction of database processing errors covered in other sections of this audit. PowerNet is cognisant of required timeframes and makes ever endeavor to meet them. In some instances backdating takes precedent for the correctness of data.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above		

Non-compliance	Description
Audit Ref: 4.6 With: 7(1) of Schedule 11.1 From: 01-Aug-18 To: 15-Aug-19	Lack of information in the registry for a small number of ICPs Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are recorded as moderate because some refinement could still be made. PowerNet run a number of reports which monitor integrity and validity of information in the registry. Audit risk rating is assigned as low because the impact on settlement outcomes is minimal (a small number of ICPs)

Actions taken to resolve the issue	Completion date	Remedial action status
6 ICPs Where trader had added UML – Queried the trader re this data update. They advise a purge of their system found these UML records which were not fully implemented, hence their updating populated the registry. PowerNet's original population of UML was from traders' records as we had none of our own. These records did not come from the trader at the time. They are being verified between ourselves and the trader, once confirmed the registry will be updated accordingly. See also comments in 2.1 regarding an error in our database affecting IED population to the registry. This error has been resolved.	In progress	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Issues are noted and consideration will be given to any safeguards that can be developed to alert for these or similar situations.	Ongoing	

Non-compliance	Description
Audit Ref: 4.11 With: 20 of Schedule 11.1 From: 01-Aug-18 To: 15-Aug-19	Effective date of ICPs being decommissioned is the same as the date of update of the registry Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3

Audit risk rating	Rationale for audit risk rating
Low	Controls are recorded as weak. The process was corrected but it was not followed up to check if the information sent to the registry was correct. Audit risk rating is recorded as low because the impact on the settlement outcome is small

Actions taken to resolve the issue	Completion date	Remedial action status
See Comments in 2.1		Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
See Comments in 2.1		

Recommendation	Description	Audited party comment	Remedial action
To implement some detective controls and regularly download LIS files to check accuracy and correctness of ICP information	Some information is transferred to the registry incorrectly or not at all		

Recommendation	Description	Audited party comment	Remedial action
To have an acceptance of the ICP from traders "delivered" to a single email address, which is monitored by the administration team. Implement detective controls, which will identify new ICPs for which acceptance was not received or not actioned	A small number of new connections are electrically connected without an ICP recorded in the registry	In previous audits occurrences of ICPs electrically connected with no Proposed Trader were discovered. Therefore processes were changed to withhold the ICP from the Registry until the trader had accepted the ICP. Expectation had been traders would be prevented from progressing the ICP without the Registry record. This has proven not to be the case for particularly TrustPower and resulted in a greater non-compliance	Implement reporting as outlined, and investigate other process changes to create a safeguard from this situation.