

## Compliance plan for Vector Distributor – 2019

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) & 10.6(1)  From: 01-Sep-18 To: 31-Aug-19	Registry information not complete and accurate in all instances specifically in relation to the capturing of the initial electrical connection date and the accuracy of unmetered load details.  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 as they will mitigate risk most of the time but some opportunities for further improvements have been identified.  The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.	
Actions taken to resolve the issue		Completion date
Please refer below		
Preventative actions taken to ensure no further issue will occur		Completion date
Event date: Vector have updated our process instructions to populate the event date with the initial energisation date.		15/10/2019
Initial electrical connection date: refer actions in section 3.5		In progress

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: 11.2(2)  From: 01-Sep-18 To: 31-Aug-19	Errors not corrected as soon as practicable. 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 rated as moderate as the checks in place identify most potential discrepancies but not all.  The audit risk rating is low as the incorrect initial electrical connection dates are not used directly in the reconciliation process.	
Actions taken to resolve the issue		Completion date
Vector will include the new Audit Compliance report from the registry in the monthly reporting to identify potential errors and resolve any discrepancies.		16/10/2019
Preventative actions taken to ensure no further issue will occur		Completion date
As above		
		Identified

Provision of ICP information to the registry			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 11.7</p> <p>From: 29-Aug-13</p> <p>To: 31-Aug-19</p>	<p>10,160 ICPs with no initial electrical connection date populated since this requirement came into effect.</p> <p>14 ICPs with unmetered load created during the audit period but where Vector has no unmetered load recorded.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>Controls are rated as weak as the process in place to capture the initial electrical connection date is not independent of the trader and the capturing of unmetered load details is weak.</p> <p>The audit risk rating is medium due to the volume of ICPs with no initial electrical connection date populated since this requirement came into effect, preventing validation of the first active date to be confirmed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Unmetered Load: ICPs Fixed immediately</p> <p>Initial electrical connection date: Refer actions section 3.5</p>		17/10/19	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	

<p>Unmetered Load: Vector agrees that the upfront process for recording unmetered load is flawed. On request for creation of a UML ICP crucial information such as what the supply is for is often missing from the contractor or retailer and needs to be followed up. There is also lack of understanding from all parties as to how some of these supplies operate i.e. the plate wattage should not be used as set up wattage in order to calculate a sensible daily kWh figure.</p> <p>Vectors Remedial Action is to introduce a new process whereby any new unmetered ICP created will then be sent to Vector Billing to set up the UML load.</p> <p>14 ICPs with unmetered load created during the audit period but where Vector has no unmetered load recorded.</p> <p>After investigation it was found for many of these the load is recorded on Vectors system and shows on the registry historical records, however an ongoing system bug whereby subsequent GXP updates to registry overwrites the unmetered load with blank field. This was thought to be fixed but apparently still more work to be done. Going back to the developer for further investigation and remedy.</p> <p>Initial electrical connection date: Refer actions section 3.5</p>	<p>07/10/2019</p>	
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Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: 7(2) of Schedule 11.1</p> <p>From: 09-May-12</p> <p>To: 13-Jun-19</p>	<p>27 ICPs not updated on the registry prior to commencement of trading.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>The controls are rated as moderate as the registry updating process is unnecessarily causing ICPs to appear to be backdated.</p> <p>The audit risk rating is volume of ICPs affected is very small.</p>	
Actions taken to resolve the issue		Completion date
All noted issues were corrected at the time.		
Preventative actions taken to ensure no further issue will occur		Completion date
<p>Timing of Gentrack process updates has been changed. Process now runs at 10pm each day.</p> <p>Vector are currently working on a system solution to prevent users from creating events that predate the ICP creation date. Solutions are still being investigated.</p>		<p>07/10/2019</p> <p>Estimated Dec 2019/Jan 2020</p>
		Investigating

Timeliness of provision of IECD		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Sep-18</p> <p>To: 31-Aug-19</p>	<p>9,251 late initial electrical connection dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as weak as Vector has made the traders responsible for the provision of this data, and it either not being provided or provided late in many instances.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Vector are continuing to follow up with traders and livening agents to obtain and populate the missing energisation dates.		Ongoing
Preventative actions taken to ensure no further issue will occur		Completion date
Initial Electrical Connection Date: Vector are reviewing the current process for warranted persons. Vector propose to directly warrant the livening agent. As part of the agreement, the livening agent will be required to supply the connection date direct to Vector within agreed timeframes. Our networks HSE team is progressing this change in process.		Estimated April 2020
Event date: Vector have updated our process instructions to populate the event date with the initial energisation date.		15/10/2019

Connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 11.17</p> <p>From: 09-May-12</p> <p>To: 13-Jun-19</p>	<p>26 ICPs connected without a trader having accepted responsibility for them on the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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	
<b>Low</b>	<p>The controls are rated as moderate as the registry updating process is unnecessarily causing ICPs to appear to be backdated.</p> <p>The audit risk rating is volume of ICPs affected is very small.</p>	
Actions taken to resolve the issue		Completion date
Refer preventative action below		
Preventative actions taken to ensure no further issue will occur		Completion date
Timing of Gentrack process updates has been changed. Process now runs each day at 10pm.		07/10/2019
		Investigating

Management of “new” status			
Non-compliance	Description		
<p>Audit Ref: 3.13</p> <p>With: 13 Schedule 11.1</p> <p>From: 01-Sep-15</p> <p>To: 16-Sep-19</p>	<p>ICPs in the “New” status not managed.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</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 ICPs at these were the only two ICPs at the “New” status indicating these were both exceptions and not an endemic process issue.</p> <p>The audit risk rating is low as only two ICPs were affected and the incorrect status has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Both ICPs have been corrected		17/10/2019	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Vector are generating a new report to be able to monitor ICPs in a “New” status in future		Estimated Nov 2019	

Monitoring of “new” & “ready” statuses		
Non-compliance	Description	
Audit Ref: 3.14 With: 15 Schedule 11.1  From: 09-May-16 To: 31-Aug-19	ICPs at new and ready not monitored.  Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as weak whilst they are being identified the process to contact traders does not appear to be being actioned. The audit risk rating is low as the overall volume of ICPs affected is small.	
Actions taken to resolve the issue		Completion date
Retailers have been emailed ICPs greater than 24 months through to the trader for confirmation.		29/08/2019
Preventative actions taken to ensure no further issue will occur		Completion date
Vector have changed monitoring of ready and new status to be included in the monthly reporting rather than separately actioned.		Effective 1 November
		Identified

Embedded generation loss category			
Non-compliance	Description		
Audit Ref: 3.15 With: Clause 7(6) Schedule 11.1  From: 14-Jun-13 To: 27-May-19	Unique loss factor code not recorded from the date generation is recorded. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	Controls are rated as weak as this generation was not recorded on the registry and therefore the unique loss factor was not created.  The audit risk rating is rated as medium due to the volumes associated with this ICP.		
Actions taken to resolve the issue		Completion date	Remedial action status
The loss category of RDVL has been set effective 01/11/2018 as this is when additional generation was added to the site by the consumer.  Vector are currently investigating the appropriate loss factor for the period between initial generation installation 2013 and additional generation added in 2018.		Ongoing	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Vector are reviewing our distributed generation process for >10kw to include requirement for new loss factor to be created.		Estimated 1 Nov 2019	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: clause 8 schedule 11.1</p> <p>From: 01-Sep-18</p> <p>To: 31-Aug-19</p>	<p>Registry event updates backdated greater than three days.</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 as controls are sufficient to mitigate risk but there is still room for errors to occur.</p> <p>The audit risk rating is low as the volume of late updates is low in relation to the volume of updates to the registry.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Distributed generation: The batteries are setup not to export any energy, but it is possible for them to export a little. The registry was rectified at the time it was brought to our attention.		Various dates	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Address: Vector will ensure on any further bulk update processes that the current date is used rather than the previous event date.</p> <p>NSP: Our intention is to continue to run our NSP report to monitor this. We will also review the NSP listed on the Audit Compliance report.</p> <p>Decommission: System process change to be implemented. When the trader activity opens, system will automatically check status of ICP from registry. If status is "Ready for decommissioning", system will automatically close the trader activity.</p>		<p>n/a</p> <p>n/a</p> <p>Estimated Nov 2019</p>	

Notice of NSP for each ICP			
Non-compliance	Description		
Audit Ref: 4.2 With: Clause 7(1)(b) Schedule 11.1  From: 01-Sep-18 To: 31-Aug-19	52 ICPs mapped to the incorrect NSP. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.  The risk rating is low as Vector has one balancing area per network and therefore an incorrect NSP has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Of the ICP samples that were reviewed by our item, a large number of ICPs fell into one of the following three categories: <ol style="list-style-type: none"> <li>ICPs on pending Transformers</li> <li>ICPs on Transformers with typos</li> <li>ICPs on 'dummy' GXP (generally Streetlights, Toilets or Traffic Lights).</li> </ol> These were identified to the customer team for remediation.		Ongoing	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
To mitigate the number of errors going forward, the new Audit Compliance report supplied via registry will now be run monthly to monitor potential errors. Report will be reviewed, and errors corrected.		15/10/2019	

ICP location address			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 01-Sep-18</p> <p>To: 31-Aug-19</p>	<p>2,244 ICPs with addresses that are not readily locatable.</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>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Vector continue to work on identifying and correcting historical address information on our ICPs. This is an ongoing project.		Ongoing	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>For permanent ICPs, Vector are requesting written confirmation from customer as to permanent address, usually in the form of an email or letter from Council.</p> <p>For builders' temporary supplies, Vector use the proposed address from the customer as outlined on their approved subdivision plans.</p> <p>For all new ICPs and address changes, Vector check to see if there is an existing ICP already with the same address. If so, the new ICP creation is placed on hold while further information is obtained from customer.</p>		Existing Process	

Distributor to provide ICP information to the registry.			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Sep-18</p> <p>To: 31-Aug-19</p>	<p>Distributed generation details incorrect for a small number of ICPs.</p> <p>13 ICPs with an incorrect initial electrical connection date populated.</p> <p>Incorrect unmetered load recorded for potentially 55% (based on the sample) of those with a variance between the traders daily kWh figure and the Vector unmetered load description.</p> <p>Four "GN" ICPs with an incorrect dedication flag of "Y".</p> <p>43 LE ICPs with the incorrect NSP dedication flag of "N".</p> <p>Potential impact: Medium</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>Controls are rated as moderate as they will mitigate risk most of the time, but the area of unmetered load indicates that the potential error rate is high.</p> <p>The risk rating is low, but it would be medium if the trader's used Vector's unmetered load details for reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The NSP dedicate flag has be corrected on all ICPs identified. Vectors process document for LE ICPs has been updated to outline requirements for the dedicated NSP flag to be marked as Y.</p> <p>Vector are still confirming the correct initial electrical connection date with both trader and the livening agent and will correct dates where necessary.</p> <p>Vector are still investigating the potential generation installations listed on the EMI site. Actions as noted in the earlier table.</p>		07/10/2019	Investigating
		Ongoing	
		Ongoing	
Preventative actions taken to ensure no further issue will occur		Completion date	

Vector is concerned at the statement that 55% of this load is incorrectly recorded.

n/a

Of the 98 sites on the UNET network - 5 required fixing by distributor. Most of the remainder are not a volume issue, a few have sent back to retailer to fix or clarify.

On the VECT network these fell into the below categories with most of the ICPs falling into category 1 below

1. Retailer and network are billing the same. The networks load is rounded to two decimals to go to registry i.e. 25.2Watts description but showing as .03/24HR. To remedy any confusion Vector will ask developer to open up the field to send to 4 decimal places on the registry.
2. Retailer and network have the same description however the sheet shows a different calculation for the retailer and the network. Not sure who has done this calculation, but Vector does not understand why there is a difference.
3. Distributor has set up load as 24HR when it should be ENG and vice versa. These have been fixed.
4. Discrepancy between retailer and distributor load which are being worked through and verified by Vector and corrected either from the network or the retailer side.
5. Multiple unmetered load i.e. engineered and 24 hour on an ICP. Distributor is showing this as #kW/ENG and #kW/24 hour or alternately Mult Load. Each retailer reports this on the registry differently.
6. Varying descriptions by retailer for standard equipment for which Vector sets a standard wattage e.g. in the below example the two highlighted have the same description but the sheet sent from the auditor shows a different calculated daily kWh figure.

VECT		<u>Dist</u>	<u>Dist</u>	Ret	RET
0.05	kW 24	VECT Auto Gate	1.2	0.6	0.025;24;AutoGate
0.05	kW 24	VECT Auto Gate	1.2	0.3	0.05KW:24:VECT AUTO GATE
0.05	kW 24	VECT Auto Gate	1.2	0.936	0.05kW:24:VECT Auto Gate
0.05	kW 24	VECT Auto Gate	1.2	0.55	0.55;1;AutoGate
0.05	kW 24	VECT Auto Gate	1.2	0.34	340.00;1.00;UNM UnKnown

Vector has 114,076 unmetered ICPS 97% of the volume is engineered load that is updated monthly on the registry in line with the AT database. This load is further reconciled each month in line with the GXP metered data. The remaining 3% being 24hour supply – table as below.

Type	Supplies	<u>kWhs</u>	%
ENGINEERED	112,331	4,123,489.57	97.48
24HR	1,745	106,551.00	2.52
<b>Grand Total</b>	<b>114,076</b>	<b>4,230,040.57</b>	

All load is set up in watts and loaded against the ICP and then calculated into kW in format 0.00 to the registry and noted as either ENG (engineered) or 24HR. Vector believes this to be clear to the trader whether to multiply the kW by the ENG profile or by 24HR. In some cases there are two items of UML on an ICP so the load will show as kW/ENG and kW/24UC. In

cases where there is multiple load and not enough space to record items this is shown as Mult and information is provided to retailer.		
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Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: clause 20 schedule 11.1</p> <p>From: 18-Feb-15</p> <p>To: 31-Aug-19</p>	<p>ICPs decommissioned but not updated to decommissioned on the registry.</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 as controls are sufficient to mitigate risk but there is still room for errors to occur.</p> <p>The audit risk rating is low this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Remedial action status
ICPs identified have been fixed where possible. During this process we have identified further later events against 2 ICPs where the metering is now preventing the update. We are approaching the meter owner to have this reversed to enable the update.		17/10/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Refer actions in section 4.1		

Updating table of loss category codes			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 21 Schedule 11.1</p> <p>From: 14-Jun-13</p> <p>To: 27-May-19</p>	<p>One loss factor code not applied from the correct start date and not notified two months in advance.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as moderate this late update related to a one off correction.</p> <p>The audit risk rating is rated as medium due to the volumes associated with this ICP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The loss category of RDVL has been set effective 01/11/2018 as this is when additional generation was added to the site by the consumer.</p> <p>Vector are currently investigating the appropriate loss factor for the period between initial generation installation 2013 and additional generation added in 2018.</p>		Ongoing	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Vector are reviewing our distributed generation process for &gt;10kw to include requirement for new loss factor to be created.</p>		Estimated 1 Nov 2019	