

Compliance plan for WEL Networks Distributor– 2019

Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: 11.2(1) & 10.6(1)</p> <p>From: 01-Jul-17</p> <p>To: 31-May-19</p>	<p>Registry information not complete and accurate in all instances.</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:</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as they will mitigate risk most of the time but some opportunities to further improve these have been identified.</p> <p>The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
<p>In regards to the small number of variances between the initial electrical connection date, first active date and meter certification date, WEL reviewed the daily discrepancy report used and made changes to ensure that all discrepancies are picked up for investigation.</p> <p>Weekly reports of livening's are provided to WEL and were used for populating this energization dates.</p> <p>Where this was not provided, WEL used the traders date as a placeholder until the correct date was provided. Any corrections needed after this are made straight away.</p>		September 2019
Preventative actions taken to ensure no further issue will occur		Completion date
<p>WEL will be reviewing the daily discrepancy report and making changes to ensure that all discrepancies are being flagged for investigation.</p> <p>WEL will be working with necessary parties to remind them of their obligations and to ensure that they are updating the registry as they should.</p>		September 2019
		Identified

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: 26-Apr-18</p> <p>To: 18-Dec-18</p>	<p>Registry not updated prior to commencement of trading for one ICP.</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	
Low	<p>WELs has robust controls in place. The trader failed to follow WELs process causing them to be non-compliant.</p> <p>The audit risk rating is low as the one backdated created ICP was created within the 14 month revision cycle.</p>	
Actions taken to resolve the issue		Completion date
<p>As soon as the issue was identified, WEL worked with all appropriate parties to correct. Investigation revealed that a trader had not followed WEL's processes causing the non-compliance. We reiterated our processes to the trader involved.</p>		December 2018
Preventative actions taken to ensure no further issue will occur		Completion date
<p>WEL reviewed the processes involved and found them to be robust. WEL is working with all traders and contractors to ensure that WEL processes are followed,</p>		September 2019

Timeliness of provision of initial electrical connection		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 31-May-19</p>	<p>A small number of initial electrical connection dates updated greater than ten days from the event date.</p> <p>Incorrect application of event effective date for initial electrical connection updates.</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	
Low	<p>The audit risk rating is strong as WELs has robust controls in place.</p> <p>The audit risk rating is low this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Errors with incorrect livening dates were corrected as soon as they were found.		September 2019
Preventative actions taken to ensure no further issue will occur		Completion date
<p>WEL follows up with the livening agents when a livening date is not provided and our reporting indicates we should have one. If we do not get the information requested we will use the retailer date as a placeholder to ensure field is populated. Once the correct livening date has been provided this information is updated.</p> <p>WEL will work with livening agents to remind them of the importance of providing accurate livening information in a timely manner.</p>		September 2019
		Identified

Connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 11.17</p> <p>From: 26-Apr-18</p> <p>To: 18-Dec-18</p>	<p>One ICP connected without a trader having accepted responsibility for it on the registry.</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	
Low	<p>WELs has robust controls in place. The trader failed to follow WELS process causing them to be non-compliant.</p> <p>The audit risk rating is low as the one backdated created ICP was created within the 14 month revision cycle.</p>	
Actions taken to resolve the issue		Completion date
As soon as issue was identified, WEL worked with the appropriate party to correct.		September 2019
Preventative actions taken to ensure no further issue will occur		Completion date
<p>Current processes have been found to be robust as they do not allow creation of ICPs until a trader has accepted responsibility for the connection.</p> <p>WEL will monitor to ensure that traders follow the correct process, preventing future occurrences.</p>		September 2019
		Cleared

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: clause 8 schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 31-May-19</p>	<p>A small number of 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	
Low	<p>The controls are rated as moderate as WEL have robust processes in place to update the registry but due to the ICP database functioning all NSP change and many initial electrical connection date updates are recorded with an incorrect effective event date.</p> <p>The audit risk rating is low as the volume of backdated is small in comparison to the volume of changes made.</p>	
Actions taken to resolve the issue		Completion date
WEL has an internal project underway to ensure NSP change dates are correctly recorded.		September 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Once the NSP change date project is complete, this issue should be resolved.		September 2019
		Remedial action status
		Identified

Provide 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-Jul-17</p> <p>To: 31-May-19</p>	<p>Distributed generation details incorrect or missing</p> <p>Small number of ICPs with an incorrect initial electrical connection date populated.</p> <p>11 LE ICPs with the incorrect NSP dedication flag.</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>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur and I have detailed recommendations in section 2.1 to improve controls.</p> <p>The risk rating is low as the errors found have no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The 11 LE ICPs with incorrect NSP dedication flag was due to a misinterpretation of the code and were corrected once clarified.</p> <p>Incorrect kW capacity recorded for two Distributed Generation sites corrected at time of notice.</p> <p>WEL are identifying all DG approvals issued where we have not received appropriate paperwork back for them (Test forms and relevant Inspection Certificates at time of install). Installers will be asked to provide this information if installation has occurred and the registry will be updated with information.</p>		<p>August 2019</p> <p>August 2019</p>	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	

<p>The internal DG process has been reviewed and changes made. Changes include:</p> <ul style="list-style-type: none"> - Having a clear visual of dates that paperwork is expected back to us following approval (90 days) - Sign off that follow up with installer has occurred where 90 days has passed following approval with no paperwork returned - All current and past DG installers used have been emailed to remind them of their obligations to ensure that the installation, certifications and return of paperwork must be done within 90 days of approval being given to them - All traders have been emailed to advise that we have the need for the DG installation, certifications and return of paperwork to be done within 90 days of approval being given to installers and non-compliance of this can result in the disconnection of the customer's equipment and/or power supply. To ensure we do not get to the stage of needing to disconnect anything we have asked them to work with their customer in getting relevant paperwork to us in the instances where the installer does not respond to our requests. - WEL is reviewing all DG approvals since 1 Jan 2018 and obtaining any missing paperwork from installers <p>There are longer term plans to potentially automate some of the DG process via an online portal which will assist in automation of reminder emails etc. At this stage though this is just in discussions.</p>	<p>September 2019</p>	
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