

Compliance plan for Wellington Electricity

Title: Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2(1) and 10.6(1)</p> <p>From: 02-May-19</p> <p>To: 05-Sep-19</p>	<p>At least 130 network events did not have a correct effective date recorded. 109 of the affected records were corrected during the audit. 18 records relating to unmetered load corrections and three records relating to distributed generation corrections have not been updated.</p> <p>Some ongoing registry discrepancies relating to unmetered load have not been resolved.</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	
Low	<p>The controls over the non-compliances are rated as moderate.</p> <ul style="list-style-type: none"> There were some incorrect registry event dates. Wellington Electricity has begun to cleanse its unmetered load data and processes are being tested for creation and management of shared unmetered load. Once these new processes are bedded in, control ratings are expected to improve. <p>Overall controls over data accuracy are strong. Most data is accurate following data cleansing after the 2018 audit, and there have been significant improvements to the registry data validation processes. Good progress is currently being made with resolving unmetered load discrepancies.</p> <p>The impact is low. Most records with incorrect event dates have been corrected during the audit, and the impact of the missing unmetered load is expected to be low. Improvements have been made during the audit period and are expected to continue.</p>	
Actions taken to resolve the issue		Completion date
These non-compliances were identified prior to the audit and are part of a programme of work which is already underway to resolve historic non-compliances.		31/12/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Process changes have been implemented to mitigate the risk of any future non-compliance.		13/09/2019
		Identified

Title: Requirement to correct errors			
Non-compliance	Description		
Audit Ref: 2.2 With Clause 11.2(2) From: 01-Nov-18 To: 27-Aug-19	Correction of data does not consistently occur as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls have recently improved to moderate, now that progress with resolving issues has been demonstrated for standard and shared unmetered load. The risk is rated as low, typically small numbers of ICPs are affected, and/or the data has a low impact.		
Actions taken to resolve the issue		Completion date	Remedial action status
These non-compliances are part of a programme of work which is already underway to resolve historic non-compliances.		31/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process changes have been implemented to mitigate the risk of any future non-compliance.		13/09/2019	

Title: Participants may request distributors to create ICPs			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 11.5(3) From: 20-Mar-19 To: 09-Apr-19	ICP 0000160643CK4CC was created 14 business days after a request for ICP creation was received from a trader. Wellington Electricity did not advise the trader that the ICP would not be created within three business days. 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, this appears to be an isolated error. The impact is assessed to be low, the ICP was created immediately when the trader followed up.		

Actions taken to resolve the issue	Completion date	Remedial action status
Daily monitoring of all service requests has been implemented to identify any other ICP's where by a Retailer has amended the fields.	13/09/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Investigation of whether changes to our IT system to prevent a Trader from incorrectly editing the assignment field are feasible.	31/6/2020	

Title: Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 18-Dec-18</p> <p>To: 23-Jul-19</p>	<p>98 late initial electrical connection updates.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are currently strong. Improved reporting and daily monitoring processes have been put in place to ensure initial electrical connection dates are populated more promptly.</p> <p>The impact is assessed to be low based on the volume of late and missing initial electrical connection dates.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Process changes implemented earlier this year have been effective in reducing incidences of non-compliance. Historic non-compliances and those generated prior to this year's process change are being resolved as part of our data improvement programme.	31/10/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Investigation of the use of the PR255 report is underway to determine how that can augment our current processes.	31/03/2020	

Title: Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 18-Dec-18</p> <p>To: 27-Jul-19</p>	<p>295 late network updates.</p> <p>102 late pricing updates.</p> <p>28 late status updates.</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>Controls are rated as moderate, because processes have improved during the audit period.</p> <p>The risk rating is low, because most of the delayed updates were processed within 30 days. Based on the sample checked, the late updates appear to be mostly data corrections.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
WE* will continue its strong process controls, addressing of items raised by exception reporting and follow-up with contractors.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Improve monitoring processes to ensure compliance.</p> <p>Assign a team member to cover the Christmas break to reduce the non-compliances</p> <p>Identify whether robotics can be used to automate any of our otherwise manual data entry and exception reporting processes.</p>		<p>Immediate</p> <p>21/12/2019</p> <p>31/12/2020</p>	

Title: Notice of NSP for each ICP	
Non-compliance	Description
<p>Audit Ref: 4.2</p> <p>With: Clauses 7(1), (4) and (5) Schedule 11.1</p> <p>From: 01-Nov-18</p> <p>To: 27-Aug-19</p>	<p>At least 36 ICPs had an incorrect NSP recorded, and were corrected during the audit.</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		
Low	<p>Controls are rated as moderate, as they are sufficient to ensure that the majority of ICPs created by Wellington Electricity will have the correct NSP assigned. The incorrect NSPs appear to be largely historic, and Wellington Electricity has made progress on identifying issues and cleansing their NSP data. Further work is currently being undertaken and controls are expected to be strong once this is complete.</p> <p>The impact is low, and all NSPs that have been confirmed to be incorrect have been updated. For reconciliation purposes all Wellington Electricity's NSPs are in the WELLTONUNETG balancing area. It is possible affected ICPs may not be correctly identified where there are outages or maintenance work is carried out, so the potential impact is rated as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
These non-compliances are part of a programme of work which is already underway to resolve historic non-compliances.		31/12/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Weekly data updating/monitoring has been implemented between systems to monitor any discrepancies.		13/09/2019	

Title: Distributors to Provide ICP Information to the Registry manager	
Non-compliance	Description
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Aug-18</p> <p>To: 05-Sep-19</p>	<p>Three ICPs were found to have some incorrect address information recorded, and were corrected during the audit.</p> <p>LE ICP 0000161190CKBEC temporarily had dedicated NSP set to No, and was corrected during the audit.</p> <p>At least 57 ICPs did not have correct initial electrical connection date recorded. The 57 affected records were corrected during the audit.</p> <p>Generation capacity and fuel type details are recorded on the registry from the date the application for generation is approved. The installation type is not updated until EG metering is installed. At the time the registry list was run, at least 106 ICPs had incorrect generation details recorded on the registry. Some corrections have been processed, and at least 41 ICPs have some incorrect details on 05/09/19.</p> <p>25 ICPs had incorrect distributor unmetered load details. All 25 ICPs were corrected during the audit.</p> <p>Potential impact: High</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>Controls are assessed to be moderate. Controls around initial electrical connection dates have improved to moderate as new processes have been put in place to ensure initial electrical connection dates are populated more promptly. Wellington Electricity plans to improve their processes for unmetered load details, LE ICPs and distributed generation.</p> <p>The actual impact is low, because most data provided is accurate and most of the exceptions have been cleared.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>3 ICP's had incorrect addresses - these were identified by WE* daily status reporting and were corrected and cleared within the audit.</p> <ul style="list-style-type: none"> 1 LE ICP not set to dedicated NPS IED DG UML 		<p>28/05/2019</p> <p>5/08/2019</p> <p>5/08/2009</p> <p>WIP</p> <p>5/08/2019</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Duplicated and Un-locatable addresses are monitored daily.</p> <p>New LE process documentation has been created</p> <p>More regular monitoring of the metering file to determine if Import/Export meters have been installed along with the date of the metering be first installed (IED).</p> <p>UML refer 2.1</p>		<p>13/09/2019</p> <p>13/09/2019</p> <p>31/10/2019</p> <p>31/12/2020</p>	

Title: GPS coordinates	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 7(8) and (9) Schedule 11.1</p> <p>From: 25-Jun-19</p> <p>To: 05-Aug-19</p>	<p>ICP 0000157320CK7B5's GPS coordinates were in UTM format instead of NZTM2000 format. The GPS coordinates have now been removed from the registry.</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>Controls are now rated as strong. The GPS coordinates have been removed from the registry, and daily checks are now in place to identify and correct any ICPs with GPS coordinates.</p> <p>The potential impact is low, because address information will assist in the location of the ICP and the coordinates have been removed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The GPS field has been added to our daily field monitoring processes.		13/09/2019	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The GPS field has been added to our daily field monitoring processes.		13/09/2019	