

Compliance plan for Mountain Power Limited

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: 28-Mar-19</p> <p>To: 16-Jul-19</p>	<p>28 ICPs have incorrect initial electrical connection dates populated on the registry. 0000024050MO1CA has an incorrect price category populated on the registry.</p> <p>24 initial electrical connection date registry updates did not have the correct event date recorded.</p> <p>Four distributed generation updates did not have the correct event date recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Moderate controls are in place, which will improve to strong with Mountain Power's monitoring of initial electrical connection dates. If updates are processed using the Mountain Power ICP database, the correct date should be applied. The incorrect event dates appear to relate mainly to corrections which were processed manually, earlier in the audit period.</p> <p>The overall controls are currently rated as weak, because a large proportion (but small number) of dates remain incorrect.</p> <p>The audit risk rating is low. The initial electrical connection date is itself a date field, other participants can easily determine the date it applies from, even if the event date is incorrect. An incorrect event date for distributed generation and incorrect pricing information could have a minor impact on other participants.</p>	
Actions taken to resolve the issue		Completion date
Regular monthly reporting of all new ICP's with subsequent checking of the Registry for incorrectly loaded fields.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
All new ICP connection forms to be sent direct to MOPO for cross checking date input into the registry.		Ongoing
		Identified

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: 28-Jun-19</p> <p>To: 16-Jul-19</p>	<p>All 17 ICPs which became active during the audit period had late initial electrical connection date 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>I saw evidence that controls are now in place to detect ICPs which have become active and check and update initial electrical connection dates, as well as monitor new connections. All of the late updates occurred mid-July 2019 or earlier.</p> <p>Because there have been no recent new connections to prove that the improved controls are operating as expected, and all updates during the audit period were late, controls have been rated as moderate.</p> <p>The impact on participants is minor because this field is used to validate other fields against.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Under control moving forward.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All new ICP connection forms to be sent direct to MOPO for cross checking date input into the registry.		Ongoing	

Title: Monitoring of "new" & "ready" statuses	
Non-compliance	Description
<p>Audit Ref: 3.14</p> <p>With: Clause 15 Schedule 11.1</p> <p>From: 31-Jan-17</p> <p>To: 06-Nov-19</p>	<p>ICPs 0000012400MO12F (ready since 31/01/17) and 0000012452MO9A2 (ready since 03/03/17) had been followed up with the customer or their agent to determine whether they were still required, but not the trader.</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	The controls are rated as strong and the impact is low. This is a technical non-compliance because "new" and "ready" ICPs are checked directly with the party who made the application for the new connection, rather than the trader as the Code requires.		
Actions taken to resolve the issue		Completion date	Remedial action status
All new ICP's will be checked 6 months later to ensure they do not remain in the ready status.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Spreadsheet adapted to highlight new ICP's and their status, updated monthly via EIEP files.		Done	

Title: Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 21-Mar-19 To: 16-Jul-19	43 late address updates. 17 late network updates. 12 late pricing updates. 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. Most of the late updates were corrections and were correctly backdated to the date of the previous update for the record type, so that the incorrect record was replaced. Some network updates were processed from an incorrect event date, which is recorded as non-compliance in section 2.1 . There may be a minor impact on other participants, particularly for pricing updates. Processing corrections improves compliance with the completeness and accuracy requirements.		
Actions taken to resolve the issue		Completion date	Remedial action status
New connections will not be accepted if a physical address is not available.		Done	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
See above		Done	

Title: ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 06-Sep-19</p> <p>To: 06-Sep-19</p>	<p>Eight ICPs had duplicate addresses.</p> <p>15 ICPs had incorrect street names.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they ensure that most addresses are unique and accurate.</p> <p>Incorrect addresses may have a minor impact on other participants, as they can make it more difficult to ensure the correct property is identified for switching and meter reading.</p>	
Actions taken to resolve the issue		Completion date
Correct addresses must be provided prior to acceptance for connection.		Done
Preventative actions taken to ensure no further issues will occur		Completion date
See above		Done

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: 06-Sep-19</p> <p>To: 06-Nov-19</p>	<p>28 ICPs have incorrect initial electrical connection dates populated on the registry.</p> <p>0000024050MO1CA has an incorrect price category populated on the registry.</p> <p>Three ICPs with distributed generation temporarily had an installation type of L recorded, instead of B. The records were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 the moderate.</p> <ul style="list-style-type: none"> Mountain Power has requested connection paperwork be provided to them, so they can detect incorrect initial electrical connection dates and arrange correction. Mountain Power advises Alpine Energy of the price category codes to apply, and periodic monitoring is in place to identify and correct inaccurate codes. The incorrect installation types were data processing errors. <p>The number of discrepancies is minor and have no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Discussions held with AEL on this and other matters		Done	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing discussions with AEL		Ongoing	

Title: Creation of loss factors			
Non-compliance	Description		
<p>Audit Ref: 8.1</p> <p>With: Clause 11.2</p> <p>From: 01-Mar-19</p> <p>To: 06-Nov-19</p>	<p>Loss factors are not accurate as indicated by the reconciliation losses.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 because although the loss factors are not adjusted to reflect reconciliation losses, they are aligned with the parent network. The loss factors are monitored, and the network is configured to minimise technical losses.</p> <p>UFE is allocated to participants; therefore there is no adverse impact on settlement; however traders may use published losses in pricing decisions, therefore the use of inaccurate loss factors could lead to incorrect pricing, which is considered to have a medium impact.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
MOPO monitors losses and will look to review loss factors going forward		Ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
See below	Ongoing	