

Compliance plan for Northpower - 2019

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule11.1</p> <p>From: 16-Sep-17</p> <p>To: 13-Jan-19</p>	<p>Two ICPs did not have Initial Electrical Connection Date recorded in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>We have recorded the controls as strong. Northpower is very good at validating information. These two ICPs were overlooked, it was human error. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The Initial Electrical Connection Date for these two ICPs (0000569980NRF3A and 0000569847NRC1B) was updated in the Registry as soon as they were identified during the audit. In both cases the Initial Electrical Connection Date had been correctly loaded into Gentrack so it isn't clear why this did not trigger the automatic Registry update</p>		24/1/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>An extra monthly "audit" process will be added.</p> <p>An ICP List snapshot file requested from the Registry will be loaded into an ACCESS database so that several queries (including no Initial Electrical Connection Date) can check for missing data. This will be an additional "audit" process to the existing daily audit queries run against the Northpower ICP/Meters database to check for missing or invalid data.</p>		31/5/2019	

Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: 11.17 (2)</p> <p>From: 16-Sep-17</p> <p>To: 13-Jan-19</p>	<p>New ICPs are connected without a request from a trader.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as moderate. new connections are electrically connected by the Contracting Division of Northpower therefore there is low risk that it will be done without SRs. The fact that it will be contracted to third parties needs to be assessed. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will not be changing its current ICP creation processes and will continue to place the retailer nominated by the customer in the Registry as the “proposed trader” at the time of creating the new ICP.</p> <p>However, with the move away from Northpower Contracting being the sole metering/livining contractor to using only third party contractors for both meter installation and livining the various “approval” steps are likely to change.</p>		Under review due to process changes	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>ICPs are not connected or electrically connected without the “approval” of a trader. Up until the 1/4/2019, this approval was the receipt of a service request from the trader accepting the ICP and requesting the metering to be installed and the ICP to be electrically connected.</p> <p>Several traders use the Disconnected – New Connection in Progress status to initiate their customer “sign-up” process. With the implementation of Part 10, Northpower was requested to move the ICP to the “ready” status as quickly as possible so that the proposed trader could accept the ICP in the Registry to start their “sign up” process.</p>		No action	

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 13-Jan-19</p>	<p>A small percentage of updates to the registry were later than 3BD.</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>We have recorded the controls as strong. Northpower constantly reviews its data, using specially design queries, to check that it is accurate. Late updates to the registry are caused by special circumstances such as correction of errors, being aware that UML was removed, Gentrack issues. No impact on traders or settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ol style="list-style-type: none"> 1. Northpower will correct any data errors discovered in the Registry and this often requires existing historical Registry entries to be replaced. 2. Decommissioning of ICPs cannot be completed in the Registry until any subsequent entries are removed and the trader moves the Registry status to Inactive Ready for Decommissioning. Unfortunately, it can take some weeks and several emails before these Registry changes are made by a trader. 3. With regard to backdating price category code changes, Northpower is happy to do this for a reasonable period (usually 1 month maximum) if agreed with the trader and the change is in the best interest of the customer. 		Not Applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Gentrack will often send a backdated entry to the Registry, often related to the Part 10 go-live, when data for an ICP is changed that affects the Registry. We have introduced checks to capture, then reverse, these old entries however this will mean both the initial update and the reversal are effectively backdated beyond 3 working days.</p>		Not Applicable	

Non-compliance	Description		
<p>Audit Ref: 4.5</p> <p>With: 2 of Schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 13-Jan-19</p>	<p>1 ICP cannot be easily disconnected because of an access issue to the main switch; the problem was created during the splitting of a motel into separate holiday units.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as weak. It is a known problem, which was “created” in 2008 during the split of an existing motel into separate holiday units; there is no impact on settlement outcomes, audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This last ICP has “interim certified” metering (MEP is Northpower) so it is on the list of ICPs that Northpower has agreed with Contact Energy for a change to Metrix advanced meters. When field staff are available to carry out the meter change, the trader will be asked to arrange access to the meter board with their customer.</p>		31/7/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>It has been re-iterated the requirements of the Code to both the Northpower Network design team and Network Engineers that all ICPs must be able to be disconnected without disconnecting any other ICP. Often disconnection problems arise where the disconnection point is on an internal shared meter-switchboard as access has to be arranged through the trader.</p>		On-going	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule11.1</p> <p>From: 01-Jun-17</p> <p>To: 13-Jan-19</p>	<p>3 ICPs had incorrect data in the registry.</p> <p>Potential impact: Low</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>We have recorded the controls as strong. Northpower runs several queries to validate the accuracy of data. Information incorrect for a very small number of ICPs. Audit risk rating low, no impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will continue to be proactive in our attempts to identify and correct data errors in Gentrack or the Registry. The correction of data errors often requires existing historical Registry entries to be replaced, resulting in event dates beyond the Code limit of 3 business days.</p> <p>Because of correcting some historic Registry data we found that additional work is involved in chasing traders to update their Registry data (notably unmetered load). It appears that many traders do not review the Notification Files received from the Registry for data changes.</p>		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Northpower will continue to be proactive in our attempts to identify and correct data errors in both Gentrack and the Registry.</p>		On-going	

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: 14 of Schedule11.1</p> <p>From: 01-Jun-17</p> <p>To: 13-Jan-19</p>	<p>Incorrectly assigned status “ready” No confirmation from a trader accepting responsibility is received for the ICP before the “ready” status is assigned.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as moderate. Northpower has a good process to receive a confirmation from a trader accepting responsibility for the ICP. The problem is that it is received after the registry changes the ICP status to “ready”. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will not be changing its current ICP creation processes and will continue to place the retailer nominated by the customer in the Registry as the “proposed trader” at the time of creating the new ICP.</p> <p>However, with the move away from Northpower Contracting being the sole metering/livening contractor to using only third party contractors for both meter installation and livening the various “approval” steps are likely to change.</p>		Under review due to process changes	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>ICPs are not connected or electrically connected without the “approval” of a trader. Up until the 1/4/2019, this approval was the receipt of a service request from the trader accepting the ICP and requesting the metering to be installed and the ICP to be electrically connected.</p> <p>Several traders use the Disconnected – New Connection in Progress status to initiate their customer “sign-up” process. With the implementation of Part 10, Northpower was requested to move the ICP to the “ready” status as quickly as possible so that the proposed trader could accept the ICP in the Registry to start their “sign up” process.</p>		No action	