

Compliance Plan Mountain Power Distributor 2021

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1) From: 02-Dec-20 To: 15-Oct-21	One ICP with the incorrect initial electrical connection date recorded. One ICP became active during the audit period but had no initial electrical connection date populated. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as they will eliminate risk to an acceptable level. The audit risk rating is low as there is little to no impact to the market as a result of the discrepancies found.	
Actions taken to resolve the issue		Completion date
Monthly AC020 reporting to be carried out.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
See above.		Ongoing
		Identified

Removal or breakage of seals		
Non-compliance	Description	
<p>Audit Ref: 2.3</p> <p>With: Clause 48(1A) and 48(1B) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 15-Oct-21</p>	<p>Alpine seals used on the Mountain Power network.</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>The controls are recorded as moderate as seals are used but Mountain Power have no seals of their own and an Alpine seal is used.</p> <p>The audit risk rating is low as there are very few incidents where seals are required to be used.</p>	
Actions taken to resolve the issue		Completion date
MOPO will have seals made for it so that AEL seals are not used on our networks.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
See above.		Ongoing
		Remedial action status
		Identified

Provision of information on dispute resolution scheme		
Non-compliance	Description	
Audit Ref: 2.4 With: 11.30A From: 01-Dec-20 To: 15-Oct-21	The Utilities Dispute information is not provided in communications to the consumer. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as none because Mountain Power do not provide any provide Utility Dispute information in written communications. There is no impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
On the very occasional email correspondence MOPO has with ICPs, Utilities Dispute info will be provided/shown. We question why a risk rating of 5 is given here when we hardly ever deal directly with consumers AND there is minimal impact. Please advise.		As and when required
Preventative actions taken to ensure no further issues will occur		Completion date
See above.		As and when required
		Identified

Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 11.7</p> <p>From: 01-Dec-20</p> <p>To: 15-Oct-21</p>	<p>One ICP became active during the audit period but had no initial electrical connection date populated.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong as they will eliminate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Network manager to forward all copies of new connection inquiries as and when they occur. Paperwork to be followed up with AEL.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above		Ongoing
		Identified

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: 01-Dec-20</p> <p>To: 15-Oct-21</p>	<p>Four ICPs 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>The controls are recorded as moderate because they mitigate risk most of the time, most initial electrical connection dates were populated on time.</p> <p>The audit risk rating is assessed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Systems are now in place to prevent this from happening. The odd error is now caused by either a misunderstanding or due to being overlooked for simple reasons.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Systems in place to prevent such occurrences.		Ongoing
		Remedial action status
		Identified

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 07-Sep-19 To: 30-Nov-20	20 late price code changes. 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. Changes are made as soon as Mountain Power are aware, but this is not always within the required timeframe. The audit risk rating is assessed to be low as the volume of late updates is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Non-compliance due primarily to trader not making request until after 3 working day timeframes. Not really our fault, is it?		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.		Ongoing	

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-Dec-20</p> <p>To: 15-Oct-21</p>	<p>One ICP with the incorrect initial electrical connection date recorded.</p> <p>One ICP became active during the audit period but had no initial electrical connection date populated.</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as they will eliminate risk to an acceptable level.</p> <p>The audit risk rating is low as there is little to no impact to the market as a result of the discrepancies found.</p>	
Actions taken to resolve the issue		Completion date
Followed up again with trader and resolved.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
See above		Ongoing

Creation of loss factors		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 11.2 From: 01-Dec-20 To: 15-Oct-21	Loss factors are not accurate as indicated by the reconciliation losses. 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 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. 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 low impact.	
Actions taken to resolve the issue		Completion date
Ongoing vigilance to monitor losses on both networks. New loss factors to be updated once Alpine Energy have completed their review, expected to be mid 2022.		2022
Preventative actions taken to ensure no further issues will occur		Completion date
See above		2022
		Identified