

# Compliance plan for Manawa Energy Limited Distributor 2023

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1  With: Clause 11.2(1) and 10.6(1)    From: 30-Nov-20 To: 20-Jan-23	<b>DUNW</b>  New ICPS 0000513444DE495 and 0000511212DE854 are connected but do not have initial electrical connection dates recorded.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls over data accuracy are strong overall because only two exceptions were identified.  The audit risk rating is low because there is no direct impact on submission. Retailers may use this information to check their active dates.	
Actions taken to resolve the issue	Completion date	Remedial action status
These two ICPS have been followed up with Aurora. Aurora have updated the IECD dates for both ICPS	Cleared	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will discuss with Aurora what actions can be taken to resolve future discrepancies of this nature	30/04/2023	

Requirement to correct errors	
Non-compliance	Description
Audit Ref: 2.2  With: Clause 11.2(2) and 10.6(2)    From: 30-Nov-20	<b>DUNW</b>  New ICPS 0000513444DE495 and 0000511212DE854 are connected but do not have initial electrical connection dates recorded.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong

To: 20-Jan-23	Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls over data accuracy are strong overall because only two exceptions were identified.</p> <p>The audit risk rating is low because there is no direct impact on submission. Retailers may use this information to check their active dates.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
These two ICPS have been followed up with Aurora. Aurora have updated the IECD dates for both ICPS		Cleared	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
We will discuss with Aurora what actions can be taken to resolve future discrepancies of this nature		30/04/2023	

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: 30-Nov-20</p> <p>To: 20-Jan-23</p>	<p><b>DUNW</b></p> <p>New ICPs 0000513444DE495 and 0000511212DE854 are connected but do not have initial electrical connection dates recorded.</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>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are weak, because neither new ICP had an initial electrical connection date populated although Aurora has a process for populating initial electrical connection dates.</p> <p>The audit risk rating is low because there is no direct impact on submission. Retailers may use this information to check their active dates.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
These two ICPS have been followed up with Aurora. Aurora have updated the IECD dates for both ICPS		Cleared	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
We will discuss with Aurora what actions can be taken to resolve future discrepancies of this nature	30/04/2023

Embedded generation loss category		
Non-compliance	Description	
<p>Audit Ref: 3.15</p> <p>With: Clause 7(6) Schedule 11.1</p> <p>From: 01-May-08</p> <p>To: 10-Jan-22</p>	<p><b>TRPG</b></p> <p>ICPs 0000207212DE07E, 0001187181WFB22 and 0001190422WF679 have generation capacity over 10 MW but do not have unique loss factor codes recorded.</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	
<b>Low</b>	The controls are recorded as strong because this is a technical non-compliance with no impact. The audit risk rating is low because all loss factors for TRPG are 1.	
Actions taken to resolve the issue		Completion date
<p>The technical non-compliance will remain for the windfarm ICP's given the equivalent physical connection properties of the two connections.</p> <p>The technical non-compliance will remain for the Waipori ICP's as the Waipori Village gate ICP shares the same embedded network as the residual ICP</p>		31/01/2023
Preventative actions taken to ensure no further issues will occur		Completion date
The loss factors of ICP's with generation greater than 10MW are carefully calculated & regularly reviewed. New loss codes are created where applicable		31/01/2023
		Identified

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 15-Jan-21 To: 29-Mar-21	<b>DUNW</b> Eight late address updates. Two late network updates. 14 late pricing updates. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are moderate because 34/65 registry updates were late and all late updates were corrections.  The audit risk rating is low because the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
As identified by the auditor the late updates were caused by a system issue that has since been resolved		31/01/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No preventative actions required as issue resolved with system update		31/01/2023	

Distributors to Provide ICP Information to the Registry manager			
Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1  From: 30-Nov-20 To: 20-Jan-23	New ICPs 0000513444DE495 and 0000511212DE854 are connected but do not have initial electrical connection dates recorded.  Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls over data accuracy are strong overall because only two exceptions were identified.		

	The audit risk rating is low because there is no direct impact on submission. Retailers may use this information to check their active dates.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
These two ICPS have been followed up with Aurora. Aurora have updated the IECD dates for both ICPS	Cleared	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We will discuss with Aurora what actions can be taken to resolve future discrepancies of this nature	30/04/2023	

<b>Updating loss factors</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 5.2 With: Clause 22 Schedule 11.1  From: 01-Feb-22 To: 01-Apr-22	<b>DUNW</b> WPVLV was not updated to the new loss factor code value of 1.2063 from 1 April 2022.  Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are strong, the update was accidentally missed when processing loss factor updates and it appears to be an isolated issue.  The impact is low, based on the loss factor difference and that the missed update was added as soon as possible once it was identified during the audit.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The loss code entry was added to the loss factor table at the time it was discovered during the audit	Cleared	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
The controls have been identified as strong and the issues classed as an isolated event. However we intend to discuss with Aurora whether further actions are appropriate to ensure future omissions of this nature can be avoided.	30/04/2023	