

Compliance plan for OtagoNet Joint Venture (OTPO) - 2023

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 01-Aug-21 To: 31-Jan-23	A relatively small quantity of information in the registry was inaccurate, it was spread broadly across all PowerNet networks ELIN, TPCO, LLNW, OTPO. Potential impact: Low Actual impact: Low Audit history: Many times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, since the new ICP management implemented during the previous audit period, some improvement has been demonstrated this audit period. The audit risk rating is assigned as low due to the relatively low number of ICPs involved.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continual development of PowerNet Connect and additional support reporting is created after the audit to monitor these details and work towards resolving the issue.		On Going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As Above			

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Aug-21 To: 31-Jan-23	OTPO – 4.8% of IECD input to Registry late, incorrect IECD for 2 ICPs 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	Controls are recorded as moderate. The ICP connection management system and processes applied have demonstrated improved results. They are inconsistent across networks. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Creation of PowerNet Connect Dashboard that identifies “ACTIVE” ICPs without IECD is updated and monitored daily. This is now available to all Operators who enter this data.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.1 With: Clause 8 of Schedule 11.1</p> <p>From: 01-Aug-21 To: 31-Jan-23</p>	<p>Registry information not updated within 3 business days by all PowerNet Distribution Networks ELIN, TPCO, LLNW, OTPO</p> <p>The date of Network approval of DG application is recorded as the Effective Date of DG installation in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls are recorded as moderate, in majority cases the registry is updated within timeframe specified by the Code. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Audit Compliance Report showed instances of this happening for several ICPs on the same day and so possibly identified as a glitch/failure of the database upload to the registry. PowerNet Connect Operators have also identified this at the time, in some instances, thus being able to correct the data before it is uploaded to the registry.</p>		<p>Ongoing</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>PowerNet assessing the data going through from PowerNet Connect to the Registry to identify any patterns to put in possible corrective measures.</p>		<p>05-2023</p>	

Non-compliance	Description		
Audit Ref: 4.4 With: clause 2 of Schedule 11.1 From: 01-Aug-21 To: 31-Jan-23	A small number of duplicate addresses were identified across all networks Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. The reason for this non-compliance is recognised and remedial action will be implemented. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Audit Compliance Report to be used to correct data manually in PowerNet Connect by Operators		05-2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional fields identified and to be added to PowerNet Connect reporting to help further highlight duplicated addresses		05-2023	

Non-compliance	Description		
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1 From: 01-Aug-21 To: 31-Jan-23	No IECD entry for OTPO (2 ICPs) Potential impact: Low Actual impact: Low Audit history: Many times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. PowerNet depends a lot on timeliness of information provided by the third parties. The audit risk rating is assigned as low due to a small number of ICPs with minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
IT notified of discrepancies of ICPs with no IECD date in the registry but liveness date entered into PowerNet Connect, which resulted as a system failure and data will be corrected. All other ICPs resolved since Audit Compliance Reporting run.		03/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Looking to identify cause of System failure to work to prevent future occurrences.		03/2023	

Recommendation	Description	Audited party comment	Remedial action
<p>Review process of uploading new ICPs to the registry. Create a consistent process what date is used as the Effective Date in the registry</p>	<p>It appears that in some instances when a new ICP identifier is firstly uploaded to the registry, the Creation Date is uploaded to the registry, not the Trader Authority Date field. This leads to incorrect information in the registry and increases the number of backdated entries which impacts PowerNet compliance</p>		

Recommendation	Description	Audited party comment	Remedial action
<p>Use ROI date as the Effective Date for population of distributed generation information in the registry</p>	<p>The date of Network approval of DG application is used as the Effective Date in the registry</p>	<p>Agree with recommendation</p>	<p>Use ROI date as the Effective Date for population of distributed generation information in the registry</p>