

Compliance Plan Wellington Electricity Distributor – 2023

Requirement to provide complete and accurate information	
Non-compliance	Description
<p>Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1)</p> <p>From: 01-Nov-21 To: 09-Nov-22</p>	<p>A small number of discrepancies and some corrections from the last audit still to be corrected.</p> <p>Unmetered load associated with up to 407 private lights not recorded on the registry via either standard or shared unmetered load ICPs resulting in a potential under submission of up to 138,000 kWh per annum.</p> <p>Some distributed generation event dates not reflective of connection date.</p> <p>Eight ICPs with the incorrect NSP recorded.</p> <p>One LE ICP was assigned the non-dedicated flag incorrectly.</p> <p>Five ICPs with the incorrect unmetered load details recorded.</p> <p>Potential impact: High</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>The controls are rated as strong overall as they will mitigate risk to an acceptable level. Further recommendations have been made in the audit to further strengthen controls.</p> <p>The impact is assessed to be low overall. The responsibility for the kWh volume associated with the “private” lights is yet to be determined hence I have excluded this from my assessment.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Unmetered Load for 407 private lights: Develop project plan to resolve known unmetered load.</p> <ul style="list-style-type: none"> - Develop process and documentation. - Assign/recruit resource - Test & deployment of Gentrack SUML functionality - Reconcile new connection requests received from Traders/Council and ensure this reconciles with Council database. - Investigate options to identify unknown UML. <p>Distributed Generation (DG) Event Dates: No action required.</p> <p>Eight ICPs with incorrect NSP recorded: 5 ICPs already corrected. 3 ICP's to be corrected.</p> <p>One LE ICP assigned non-dedicated flag: ICP already corrected.</p> <p>Five ICPS with incorrect unmetered load details: 5 ICP's to be corrected in registry</p>	<p>Apr 2023</p> <p>May 2023</p> <p>May 2023</p> <p>Sept 2023</p> <p>Sept 2023</p> <p>June 2023</p> <p>July 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Shared Unmetered Load: Write decisions paper for management – review connections policies on whether to allow future instances of Shared Unmetered Load on network.</p> <p>Shared Unmetered Load: Additional verification to be added to streetlights new connection process to ensure accurate information received from Trader & Councils</p> <p>Shared Unmetered Load: Add a monthly reconciliation of DUML database against new connection requests to ensure Councils are claiming all lights they have requested.</p> <p>DG Connection Date: Review DG process to capture installation dates from verifiable sources.</p> <p>ICP with incorrect NSP: No further action required as this has already been added to regular checks.</p> <p>LE ICP assigned with non-dedicated flag: No action required.</p> <p>ICPs with incorrect unmetered load details recorded: No action required</p>	<p>May 2023</p> <p>Aug 2023</p> <p>Sept 2023</p> <p>Sept 2023</p>	

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With Clause 11.2(2) From: 01-Nov-21 To: 09-Nov-22	Correction of some data not carried out as soon as practicable due to temporary work backlogs. Unmetered load associated with up to 407 private lights not recorded on the registry via either standard or shared unmetered load ICPs resulting in a potential under submission of up to 138,000 kWh per annum. Potential impact: High 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 overall, but the non-compliance remains as shared unmetered load has not been resolved for a number of years. The impact is assessed to be low overall. The responsibility for the kWh volume associated with the “private” lights is yet to be determined hence I have excluded this from my assessment.	
Actions taken to resolve the issue	Completion date	Remedial action status
Unmetered Load for 407 private lights: Develop project plan to resolve known unmetered load. <ul style="list-style-type: none"> - Develop process and documentation. - Assign/recruit resource - Test & deployment of Gentrack SUML functionality - Reconcile historic new connection requests received from Traders/Council and ensure this reconciles with Council database. Investigate options to identify unknown UML	Apr 2023 May 2023 May 2023 Sept 2023 Sept 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Shared Unmetered Load: Write decisions paper for management – review connections policies on whether to allow future instances of Shared Unmetered Load on network Shared Unmetered Load: Additional verification to be added to streetlights new connection process to ensure accurate information received from Trader & Councils Shared Unmetered Load: Add a monthly reconciliation of DUML database against new connection requests to ensure Councils are claiming all lights they have requested.	May 2023 Aug 2023 Sept 2023	

Distributors must create ICPs		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 11.4 From: 01-Nov-21 To: 09-Nov-22	Unmetered load associated with up to 407 private lights not recorded on the registry via either standard or shared unmetered load ICPs resulting in a potential under submission of up to 138,000 kWh per annum. Potential impact: High Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I rate the controls as moderate as while Wellington Electricity have a robust ICP creation process the lack of process to create shared unmetered load ICPs reduces the effectiveness of these controls. The impact is assessed to be low overall. The responsibility for the kWh volume associated with the “private” lights is yet to be determined hence I have excluded this from my assessment.	
Actions taken to resolve the issue		Completion date
Unmetered Load for 407 private lights: Develop project plan to resolve known unmetered load. <ul style="list-style-type: none"> - Develop process and documentation. - Assign/recruit resource - Test & deployment of Gentrack SUML functionality - Reconcile historic new connection requests received from Traders/Council and ensure this reconciles with Council database. Investigate options to identify unknown UML		Identified Apr 2023 May 2023 Sept 2023 Sept 2023
Preventative actions taken to ensure no further issues will occur		Completion date
Shared Unmetered Load: Write decisions paper for management – review connections policies on whether to allow future instances of Shared Unmetered Load on network. Shared Unmetered Load: Additional verification to be added to streetlights new connection process to ensure accurate information received from Trader & Councils Shared Unmetered Load: Add a monthly reconciliation of DUML database against new connection requests to ensure Councils are claiming all lights they have requested.		May 2023 Aug 2023 Sept 2023

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3) From: 01-Nov-21 To: 09-Nov-22	Two ICPs not created within three business days and notification not provided to the participant. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong; these two notifications appear to be one-off issues relating to a temporary increase of applications received by Wellington Electricity. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our daily checks process tracks all requests, providing a daily update of the number of days each request is at, and highlighting any that are overdue.		

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Nov-21 To: 09-Nov-22	Five ICPs not created or made "ready" on the registry prior to these connections being electrically connected. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as connections are able to be electrically connected as part of a project without Wellington Electricity or the trader being aware prior. While the projects team at Wellington Electricity worked closely with the contractor for Transmission Gully, the new connections team were not included in the coordination of these connections to ensure ICPs were requested and created where these were required. I recommend above that this process is reviewed. The impact is assessed to be low as this affected only five new connections were affected and all but one was corrected within the 14 month revision period therefore the impact on reconciliation is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Trader advised and ICPs created as soon as issue was identified. No further action required.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Project teams to revise project documentation to include Connections Team notification.	July 2023	
Workshop with project teams to increase knowledge of Connections process	July 2023	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Nov-21 To: 09-Nov-22	Some late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are assessed to be strong as there are robust controls in place to ensure that the initial electrical connection dates are update on time. The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Resolve historical data errors - Incorrect IEDs	June 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Change new connection process to require MEPs to provide livening information	Aug 2023	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 01-Nov-21 To: 09-Nov-22	Traders were not identified or confirmed as taking responsibility for five ICPs prior to these connections being electrically connected. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate overall due to the lack of progress in developing a process to managed shared unmetered load. The impact is assessed to be low as this affected only five new connections were affected and all but one was corrected within the 14 month revision period therefore the impact on reconciliation is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Trader advised and ICPs created as soon as issue was identified. No further action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Project teams to revise project documentation to include Connections Team notification.	Jul 2023	
Workshop with project teams to increase knowledge of Connections process	Jul 2023	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.7 With: Clause 10.31 From: 01-Nov-21 To: 09-Nov-22	Traders were not identified or requested electrical connection for five ICPs prior to these connections being electrically connected. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate overall due to the lack of progress in developing a process to managed shared unmetered load. The impact is assessed to be low as this affected only five new connections were affected and all but one was corrected within the 14 month revision period therefore the impact on reconciliation is low.	
Actions taken to resolve the issue		Completion date
Trader advised and ICPs created as soon as issue was identified. No further action required		
Preventative actions taken to ensure no further issues will occur		Completion date
Project teams to revise project documentation to include Connections Team notification.		July 2023
Workshop with project teams to increase knowledge of Connections process		July 2023
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Nov-21 To: 09-Nov-22	1,196 late pricing updates. 17 late status updates. 7 late network updates. 239 late distributed generation updates. 18 late NSP 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	Controls are rated as moderate as they will mitigate risk most of the time. The audit risk rating is low as the data discrepancies identified have little or no impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Updates were made as soon as correct information received.		
Preventative actions taken to ensure no further issues will occur		Completion date
Late Updates: Our daily checks process works to identify required updates, however we are reliant on receiving timely information from other participants. Where we are identifying & correcting historical errors, timeliness non-compliances will be unavoidable Distributed Generation Events: To review DG process to capture installation dates from verifiable sources.		Sept 2023
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1), (4) and (5) Schedule 11.1 From: 01-Nov-21 To: 09-Nov-22	Eight ICPs with the incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as Wellington Electricity processes demonstrated robust controls. The risk rating is low as Wellington Electricity has one balancing area and therefore an incorrect NSP has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
5 ICPs already corrected, 3 remaining ICPs to be investigated and corrected if needed		June 2023
Preventative actions taken to ensure no further issues will occur		Completion date
These were historical connections that reflect prior practices. Our current new connection process includes comprehensive checks to identify accurate NSP allocation. In addition we run a regular Streets with Multiple NSP report to flag any ICPs that may need further investigation.		
Remedial action status		
Identified		

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clauses 2 Schedule 11.1 From: 01-Nov-21 To: 09-Nov-22	66 active ICPs without a readily locatable address. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as Wellington Electricity processes demonstrated robust controls. The audit risk is assessed to be low as only a small number of ICPs do not have readily locatable addresses	
Actions taken to resolve the issue		Completion date
Investigate and resolve historical data errors - Non locatable addresses		Aug 2023
Preventative actions taken to ensure no further issues will occur		Completion date
Additional control to be added to new connection process to use DP number in addition to Lot #		Apr 2023
Investigate addition of GPS coordinates for rural or difficult to locate addresses		Nov 2023
		Identified

Electrically disconnecting an ICP		
Non-compliance	Description	
Audit Ref: 4.5 With: Clauses 3 Schedule 11.1 From: 16-May-16 To: 09-Nov-22	ICP 1001158552CK7FD was created and connected downstream of another ICP resulting in the possibility of it being disconnected where the upstream ICP is disconnected. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as Wellington Electricity processes demonstrated robust controls. The audit risk is assessed to be low as only a one ICP has been identified as being affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Connection to be remedied in coordination with trader	Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Change new connection process to require additional information for any commercial building conversion to verify connection configuration	Sept 2023	
Site visit to be completed for all new connections including metering only	Sept 2023	
Change pre-livening checklist for livening agents to ensure no upstream ICP prior to livening.	Oct 2023	

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-Nov-21</p> <p>To: 09-Nov-22</p>	<p>One LE ICP (0000167678CK980) with the NSP dedication initially set to No.</p> <p>One ICP (0000043289TRC57) with distributed generation present and the incorrect installation type of "L".</p> <p>Some incorrect initial electrical connection dates recorded (17 from the current audit period and the remaining all relate to prior to the requirement coming into effect).</p> <p>Some distributed generation event dates not reflective of connection date.</p> <p>Five ICPs identified from the previous with the incorrect unmetered load details recorded.</p> <p>Five ICPs with the incorrect unmetered load details recorded.</p> <p>72 unmetered pay phones with incorrect hours of operation recorded with an annual load impact of 4,925 kWh of under submission.</p> <p>Unmetered load associated with up to 407 private lights not recorded on the registry via either standard or shared unmetered load ICPs resulting in a potential under submission of up to 138,000 kWh per annum.</p> <p>Potential impact: High</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 rated as moderate as while there has been an improvement in registry accuracy with the introduction of additional processes to identify discrepancies, the ongoing delays in populating the shared unmetered load details reduces the level of controls.</p> <p>The impact is assessed to be low overall. The responsibility for the kWh volume associated with the "private" lights is yet to be determined hence I have excluded this from my assessment.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>One LE ICP assigned non-dedicated flag: ICP already corrected.</p> <p>Distributed Generation with incorrect installation type: ICP has now been confirmed with the trader and corrected.</p> <p>Incorrect IED date: All 17 ICPs already corrected.</p> <p>Distributed Generation Event Dates: No action required.</p> <p>Five ICPS with incorrect unmetered load details: 5 ICP's to be corrected in registry in coordination with trader.</p> <p>Unmetered load with potential incorrect operation hours: Work with traders to determine correct operational hours assigned.</p> <p>Unmetered Load for 407 private lights: Develop project plan to resolve known unmetered load.</p> <ul style="list-style-type: none"> - Develop process and documentation. - Assign/recruit resource - Test & deployment of Gentrack SUML functionality - Reconcile historic new connection requests received from Traders/Council and ensure this reconciles with Council database. <p>Investigate options to identify unknown UML</p>	<p>Jul 2023</p> <p>Jul 2023</p> <p>Apr 2023</p> <p>May 2023</p> <p>May 2023</p> <p>Sept 2023</p> <p>Sept 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>LE ICP assigned with non-dedicated flag: No action required.</p> <p>Distributed Generation with incorrect installation type: Incorporate use of High Risk Database into DG process to identify installations without approval.</p> <p>Incorrect IED date: No action required.</p> <p>Distributed Generation Connection Date: Review Distributed Generation process to capture installation dates from verifiable sources.</p> <p>ICPs with incorrect unmetered load details recorded: No action required.</p> <p>Unmetered Load Operational Hours: Publish operational hours for streetlight circuits as part of pricing disclosure.</p> <p>Unmetered Load for 407 private lights: Develop project plan to resolve known unmetered load.</p> <ul style="list-style-type: none"> - Develop process and documentation. - Assign/recruit resource - Test & deployment of Gentrack SUML functionality - Reconcile historic new connection requests received from Traders/Council and ensure this reconciles with Council database. - Investigate options to identify unknown UML. 	<p>Nov 2023</p> <p>Sept 2023</p> <p>Mar 2023</p> <p>Apr 2023</p> <p>May 2023</p> <p>May 2023</p> <p>Sept 2023</p> <p>Sept 2023</p>	