

## Compliance plan for Electricity Invercargill (ELIN) - 2023

Non-compliance	Description	
Audit Ref: 2.5 With: clause 11.2 and Clause 10.6  From: 01-May-22 To: 15-Apr-23	Information for a small number of ICPs, for both TPCO and ELIN, is or not up to date.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are assessed as moderate. Monitoring and correction processes are in place and registry data is corrected as anomalies are identified.  There was no impact on settlement outcomes. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Training has been undertaken to address the resourcing issue, which was a result of staff movements, to make sure that the Registry is able to be updated within 10 business days.	20/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Responsibilities and knowledge are now being shared between the Metering Manager and the Coordinator to ensure Registry deadlines are met.		

Non-compliance	Description		
Audit Ref: 4.10 With: clause 3 of Schedule 11.4  From: 01-May-22 To: 15-Apr-23	ELIN- Registry metering information updated later than 10 business days for a small percentage of metering installation records  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as moderate. Monitoring and correction process are in place but lack of resources do not allow to take a full advantage of it. PowerNet is committed to accurate registry data even where backdating is required to comply with clause 11.2 even with the consequent non-compliance. There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Training has been undertaken to address the resourcing issue, which was a result of staff movements, to make sure that the Registry is able to be updated within 10 business days.		20/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Responsibilities and knowledge are now being shared between the Metering Manager and the Coordinator to ensure Registry deadlines are met.			

Non-compliance	Description		
Audit Ref: 5.1  With: clause 4(1)(a)(b) of Schedule 10.6 & Table 1 of Schedule 11.4  From: 01-May-22 To: 30-Apr-23	<ul style="list-style-type: none"> <li>ELIN do not have certification information for 209 Metec Q meter Installations</li> </ul> Potential impact: None Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as moderate. This is a known industry issue. The issue is being managed and will correct itself as the meters are removed from service. There was no impact on settlement. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an historic issue, the number of Metec Meters will continue to decrease as they are replaced.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		<b>Completion date</b>	
As these meters are no longer installed this will cease to be an issue once all Metec Meters are replaced.			

Non-compliance	Description		
Audit Ref 6.2 With: clause 7(1)(2)(3) of Schedule 11.4 From: 01-May-22 To: 30-Apr-23	A relatively small number of control device discrepancies. <ul style="list-style-type: none"> <li>14 ELIN LCD missing records in Registry</li> </ul> Potential impact: None Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as strong because there is a robust process in place. The issue is being managed and will correct itself as metering is upgraded and transitioned to SMCO.  There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an historic issue that is being addressed as Meters are replaced in our Recertification programme.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Using the Audit Compliance Report, run monthly, to identify these discrepancies and ensuring these issues are prioritised to be corrected.		Ongoing	

Non-compliance	Description		
Audit Ref 6.3 With: clause 6 of Schedule 11.4 From: 01-May-22 To: 30-Apr-23	Report "Day 13" is run but not analysed Potential impact: None Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as weak because there is a process in place but not followed. There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Day 13 Report to be run in-house so it can be checked for errors and the report disseminated to the Metering Team to ensure this is being done.		31/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
By taking this task back in-house we are better able to ensure actions are taken.			

Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 01-May-22 To: 30-Apr-23	<ul style="list-style-type: none"> <li>ELIN -349 ICPs with expired certification</li> </ul> Potential impact: None Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are assessed as weak. There is a process in place to recertify these installations but it was not followed during the audit period.  There was no impact on settlement outcomes. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are currently in the process of setting up a Recertification Meter Replacement Batch to reduce the number of Uncertified Meters. We will be making use of the "Unable To Complete" Report to identify those that need to be referred back to the Retailer when it has been identified that no further action can be taken by the Network.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Responsibilities and knowledge are now being shared between the Metering Manager and the Coordinator.		

Non-compliance	Description		
<p>Audit Ref 7.15</p> <p>With: Clause 26(1) of Schedule 10.7</p> <p>From: 01-May-22</p> <p>To: 30-Apr-23</p>	<ul style="list-style-type: none"> <li>ELIN – 349 ICPs with expired meter certification</li> </ul> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<p><b>Low</b></p>	<p>Controls are assessed as weak. 1,121 installations have expired installation certification. There is a process in place but it was not followed during this audit period.</p> <p>There was no impact on settlement outcomes. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We are currently in the process of setting up a Recertification Meter Replacement Batch to reduce the number of Uncertified Meters.</p> <p>We will be making use of the “Unable To Complete” Report to identify those that need to be referred back to the Retailer when it has been identified that no further action can be taken by the Network.</p> <p>5 Cat 2 Jobs have been raised for Meter Replacements and CT Certification. 1 Job for ELIN has now been completed for ICP 0000732181NVF13, completed 12/06/2023.</p> <p>Action step created to contact Retailers for ICP’s with higher than 150kVA to install and certify new metering.</p>			<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>		<p>Completion date</p>	
<p>We will be investigating the financial viability of conducting another Stat Sampling Project as numbers are reducing and we are now left with difficult installations that are on the Unable to Complete Report.</p>			

Non-compliance	Description		
Audit Ref 7.16 With: Clause 28(1) of Schedule 10.7 From: 01-May-22 To: 30-Apr-23	<ul style="list-style-type: none"> <li>ELIN -11 ICPs with expired CT certification</li> </ul> Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as weak because only one cat 2 installation was recertified during the audit period.  The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
5 Cat 2 Jobs have been raised for Meter Replacements and CT Certification. 1 Job for ELIN has now been completed for ICP 0000732181NVF13, completed 12/06/2023.  Action step created to contact Retailers for ICP's with higher than 150kVA to install and certify new metering.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Using the Audit Compliance Report, run monthly, to identify these discrepancies and ensuring these issues are prioritised to be corrected.			



Non-compliance	Description		
Audit Ref 8.2 With: Clause 46(1) of Schedule 10.7 From: 01-May-22 To: 30-Apr-23	11 category 2 installations for ELIN were not inspected within the applicable period  Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as moderate because there is a robust process in place but due to a lack of resources only one cat 2 metering installation was re-certified  The audit risk rating is recorded as low due to the low number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
5 Cat 2 Jobs have been raised for Meter Replacements and CT Certification. 1 Job for ELIN has now been completed for ICP 0000732181NVF13, completed 12/06/2023.  Action step created to contact Retailers for ICP's with higher than 150kVA to install and certify new metering.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Using the Audit Compliance Report, run monthly, to identify these discrepancies and ensuring these issues are prioritised to be corrected.			